

December 27, 2021

VIA EMAIL ONLY

Samantha Langer
City of St. Paul – PED
1400 City Hall Annex
25 W 4th Street
Saint Paul, MN 55102

RE: Demolition of 1508 Como Avenue
St. Paul, Ramsey County
SHPO Number: 2022-0160

Dear Ms. Langer:

Thank you for forwarding additional information from Vicki Sheffer of the St. Paul Department of Safety and Inspections on December 20, 2021. We are reviewing this proposed project pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

In our November 18, 2021, letter, we asked for: 1) a definition of the federal Undertaking, 2) a delineation of the Area of Potential Effect (APE), 3) identification of historic properties within the APE, and 4) a Determination of Effect.

Ms. Sheffer's December 17th email attached to your most recent correspondence indicates that it is unknown at this time whether the federal undertaking—the proposed demolition—will occur but that, if it does, the city isn't aware of the nature any future redevelopment that may occur on the parcel. From Ms. Sheffer's email, we conclude that the future redevelopment is unknown and no federal or state funds have been identified to carry it out at this time.

In order to continue our review, we still will need the remaining information we asked for in our November 18th letter.

We note that our office has never reviewed a federally assisted project at 1508 Como Avenue in the past, so we infer that the current property owner hasn't been offered HUD assistance to complete repairs. If this project's undertaking were to change from demolition to rehabilitation, the need for an evaluation could be avoided by treating the property as eligible for listing in the National Register of Historic Places for the purposes of this Section 106 review and developing a

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scope of work that would meet the Secretary of the Interior's Standards for Rehabilitation.

We look forward to continuing our review once we receive the requested additional information at our dedicated email address: ENReviewSHPO@state.mn.us. If you have any questions regarding our review of this project, please contact Leslie Coburn, Environmental Review Coordinator, at 651-201-3286 or leslie.coburn@state.mn.us.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

cc: George Gause, City of St. Paul Historic Preservation Unit

From: [Sheffer, Vicki \(CI-StPaul\)](#)
To: [Langer, Samantha \(CI-StPaul\)](#)
Subject: RE: 1508 Como - SHPO Letter
Date: Friday, December 17, 2021 10:38:07 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Samantha –

Please submit this information to SHPO regarding this property:

The PO pulled a building permit to repair the roof, we are guessing they will invest the necessary funding to repair the building. We will not know that information until it's scheduled for legislative hearings sometime in January or February. If the PO does not have the necessary funding, the building will likely be recommended for demolition. This is the case with all of the properties scheduled for public hearings before the legislative hearing officer and council. As far as redevelopment after a demolition, DSI staff has no clue what the intentions may be of an owner.

If the city council orders demolition of the property, DSI will hire a preservation consultant who meets the Secretary of the Interiors professional standards to complete the bullet points defined in the SHPO letter prior to demolition.

Vicki Sheffer

TISH Program Manager

Dept. of Safety & Inspections
375 Jackson Street Suite 220
Saint Paul, MN 55101
P: 651-266-1935
vicki.sheffer@ci.stpaul.mn.us



From: Langer, Samantha (CI-StPaul) <samantha.langer@ci.stpaul.mn.us>
Sent: Thursday, December 16, 2021 1:32 PM
To: Sheffer, Vicki (CI-StPaul) <vicki.sheffer@ci.stpaul.mn.us>
Subject: Fw: 1508 Como - SHPO Letter

Hi Vicki - I heard back from Christine. Her response is below.

Sam

From: Boulware, Christine (CI-StPaul) <christine.boulware@ci.stpaul.mn.us>
Sent: Thursday, December 16, 2021 11:37 AM
To: Langer, Samantha (CI-StPaul) <samantha.langer@ci.stpaul.mn.us>; Gause, George (CI-StPaul) <George.Gause@ci.stpaul.mn.us>
Subject: Re: 1508 Como - SHPO Letter

Hi Sam,

Since DSI is using federal funds for demolition, they will need to hire a preservation consultant who meets the Secretary of the Interiors professional standards to complete the bullet points defined in the SHPO letter.

Christine Boulware

Historic Preservation Specialist

Pronouns: She/Her

Planning and Economic Development Department

25 Fourth Street West, Ste. 1400

Saint Paul, MN 55102

P: 651.266.6715

christine.boulware@ci.stpaul.mn.us

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Mission and Vision: It is the mission of the City of Saint Paul to integrate equity and inclusion into how we approach all our work.

Our vision is to be committed to building an equitable and inclusive city that will shift culture in city processes and policies, eliminate structural inequities, and ensure timely and relevant access to services, resources, support and opportunity to every person in Saint Paul.

From: Langer, Samantha (CI-StPaul) <samantha.langer@ci.stpaul.mn.us>
Sent: Thursday, December 16, 2021 8:24 AM
To: Boulware, Christine (CI-StPaul) <christine.boulware@ci.stpaul.mn.us>; Gause, George (CI-StPaul) <George.Gause@ci.stpaul.mn.us>
Subject: FW: 1508 Como - SHPO Letter

Hi Christine & George -

Vicki is asking about the status of 1508 Como. I've attached the email I forwarded to you in November. Is there any update I can provide?

Sam

From: Sheffer, Vicki (CI-StPaul) <vicki.sheffer@ci.stpaul.mn.us>
Sent: Thursday, December 16, 2021 8:08 AM
To: Langer, Samantha (CI-StPaul) <samantha.langer@ci.stpaul.mn.us>
Subject: RE: 1508 Como - SHPO Letter

Hi Sam -

What is the status on the response from SHPO for this property?

Vicki

From: Langer, Samantha (CI-StPaul) <samantha.langer@ci.stpaul.mn.us>
Sent: Friday, November 19, 2021 3:27 PM
To: Sheffer, Vicki (CI-StPaul) <vicki.sheffer@ci.stpaul.mn.us>
Subject: 1508 Como - SHPO Letter

Hi Vicki –

Attached is a letter from SHPO asking for more information regarding 1508 Como. Thank you.



Samantha Langer
Zoning Committee Secretary
Pronouns: She/Her
Planning & Economic Development
25 W 4th Street, Suite 1400
Saint Paul, MN 55102
P: 651-266-6550
Samantha.langer@ci.stpaul.mn.us
www.StPaul.gov

November 18, 2021

VIA EMAIL ONLY

Samantha Langer
City of St. Paul – PED
1400 City Hall Annex
25 W 4th Street
Saint Paul, MN 55102

RE: Demolition of 1508 Como Avenue
Saint Paul, Ramsey County
SHPO Number: 2022-0160

Dear Ms. Langer:

Thank you for the opportunity to comment on the above project. Because federal funding is involved, the project is being reviewed according to responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

Pursuant to 36 CFR 800.4-5 it is the Federal agency's responsibility to determine the area of potential effect (APE) for the federal undertaking, to identify and evaluate historic properties that may be affected by the proposed federal undertaking, and to assess adverse effects. While your submittal (received October 14, 2021) and supplemental information (received November 1, 2021) provides baseline information regarding the project location, you have not provided information sufficient for our office to complete our review. Therefore, we recommend that you submit the following additional information to our office:

- **Define Federal Undertaking and Determine the Area of Potential Effect –**
 - Please include a definition of the federal undertaking that is proposed. The house is proposed for demolition; is there a replacement building planned for construction on this site? Please give a statement about whether there is a planned re-use for the site.
 - Based upon the agency's definition of the undertaking, provide a brief written description of the area of potential effect (APE), as specified under 36 CFR 800.4(a)(1) and 36 CFR 800.16(d). Since this project includes demolition, properties on other parcels likely will be affected. Include discussion of the potential for the project to have direct and indirect effects on historic properties and provide justification of the boundaries chosen for the APE.
- **Identification of Historic Properties –**
 - Under 36 CFR 800.4(b-c) it is the federal agency's responsibility to identify and evaluate any historic properties that may be affected by the proposed project. In absence of identification and evaluation of properties within the APE, we are unable to complete project review. In order to proceed, we recommend that your agency make a reasonable and good faith effort to carry out appropriate identification efforts and apply

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National Register Criteria to evaluate properties in the APE that previously have not been evaluated for National Register eligibility. This work must meet 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 www.mnhs.org/preservation/directory, and select "Historians, Contract" in the "Search by Specialties" box. We will review the results of the survey upon completion and submittal to our office by your agency.

- **Maps** – Provide map showing the APE clearly delineated, as well as well as site plans, if new construction is proposed.
- **Determination of Effect** – Provide your agency's determination of effect, pursuant to 36 CFR 800.4(d)(1).

We look forward to continuing our review of this project. Please submit additional information to ENReviewSHPO@state.mn.us.

If you have any questions regarding our review, please contact me at leslie.coburn@state.mn.us.

Sincerely,

Leslie Coburn

Leslie Coburn
Environmental Review Coordinator

cc: George Gause, City of St. Paul Planning and Economic Development