

May 1, 2026

VIA E-MAIL

George Gause
Heritage Preservation Supervisor
St. Paul Planning & Economic Development
25 4th St W
St. Paul, MN 55102
george.gause@ci.stpaul.mn.us

RE: Demolition of Duplex at 594-596 Reaney Avenue
St. Paul, Ramsey County
SHPO Number: 2026-0710

Dear Mr. Gause:

Thank you for the opportunity to comment on the above project. Information received on April 1, 2026, has been reviewed under 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).

Unfortunately, we don't have enough information from your project submission materials to concur with your No Historic Properties Affected finding. We are providing comments on the Section 106 analysis conducted so far. But in order for us to continue our review, we request the items in **bold type**, below.

Definition of the Undertaking

We understand this project consists of demolition of the existing house and (presumably) garage and that there is no foreseeable redevelopment of the lot. However, the ground disturbance (p. 4 of the Section 106 Historic Effect Review) seems to indicate redevelopment is included in the undertaking: "Ground disturbance was evaluated for excavation, grading, trenching and other subsurface activities necessary to support site preparation, utility installation, and foundation work."

Please clarify the activities considered to be included in this undertaking and provide materials, if available, describing redevelopment plans.

Area of Potential Effects

We agree that the Area of Potential Effects (APE), as shown on page 2 of the Effects Analysis, is appropriate to take into consideration effects of this project.

Identification of Historic Properties

Archaeology

Please provide the details about the location and nature of ground disturbance proposed for this project, considering the scope of the undertaking (i.e., demolition vs. redevelopment).

Architectural History

We agree that no further research is warranted for properties within the APE for this undertaking.

Continuing Consultation

Please submit the requested information to our dedicated project review email ENReviewSHPO@state.mn.us and include SHPO #2026-0710 in the Subject line of your email.

Please contact Leslie Coburn, Environmental Review Specialist, at leslie.coburn@state.mn.us if you have any questions regarding our review of this project.

Sincerely,



Amy Spong
Deputy State Historic Preservation Officer