

October 7, 2020

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

RE: Demolition of 1976 Fairmount Avenue  
Saint Paul, Ramsey County  
SHPO Number: 2021-0012

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 September 15, 2020) 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. Based on the baseline information you provided for this project and comment from St. Paul Heritage Preservation staff, this property is located within a potentially-eligible historic district. 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 an

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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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architectural/historic 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 [www.mnhs.org/preservation/directory](http://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 justification and documentation for 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](mailto:ENReviewSHPO@state.mn.us).

If you have any questions regarding our review, please contact me at [leslie.coburn@state.mn.us](mailto:leslie.coburn@state.mn.us).

Sincerely,

*Leslie Coburn*

Leslie Coburn  
Environmental Review Coordinator

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