



## MacRostie Historic Advisors LLC

Bringing strategy, equity, and experience  
to historic building development

August 5, 2015

Saint Paul City Council  
15 West Kellogg Boulevard, #310  
Saint Paul MN 55102

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**Boston**  
**Washington**  
**Chicago**

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Dear Members of the Saint Paul City Council:

We are a twenty plus year national historic tax credit advisory firm with offices throughout the United States. We represent Exeter Group LLC on their historic tax credit rehabilitation projects including C&E Lofts and Custom House in Saint Paul, as well as for other prominent developers in Minnesota.

We have been asked to respond to commentary raised by the Saint Paul HPC and the MN SHPO related to Exeter's proposed Raymond Avenue Flats building addition in the federally registered University and Raymond local historic district. The commentary implies that the proposed building addition may lead to or "force" re-evaluation of the local district's Registered Historic District status.

Our senior staff and partners have decades of combined professional experience working with local and national historic districts and have never seen such a removal of Registered Historic District status by the National Park Service related to building changes like those proposed by Exeter. Property modifications, both compliant with historic guidelines and non-compliant with historic guidelines occur frequently, as do changes of individual building status from contributing to non-contributing without negative impact to Registered Historic District status.

Yours truly,

William G. MacRostie  
Senior Partner

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