

August 5, 2025

VIA E-MAIL ONLY

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

RE: Demolition of 1079 Arkwright Street
St. Paul, Ramsey County
SHPO Number: 2025-1464

Dear Mr. Gause:

Thank you giving us an opportunity to comment on this project, which was submitted to our office for review on July 14, 2025. This project has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by 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).

While your submittal provides baseline information regarding the project and properties involved, we do not have enough information to concur with your No Historic Properties Affected finding. In order for us to continue our review, please send the following items (underlined):

Definition of the Undertaking

We understand this project consists of the proposed demolition of the apartment building at 1079 Arkwright Street, St. Paul. We assume the associated garage structure will be demolished, as well.

Determine the Area of Potential Effects

On page 4 of the Section 106 Analysis report, the APE is described as the property parcel, but the map shows a green boundary including other properties and for which photos are provided. We would agree with the APE including the adjacent (and across the street) parcels, and we assume the green polygon is intended to represent the APE. If this is incorrect, please provide clarification.

Identification of Historic Properties

Architecture

We agree that the nature of the proposed project—demolition of the apartment building—warrants further research to identify historic properties. However, based on the information provided, including photographs of the building and a checklist of local historic contexts considered, we do not have enough information to concur that 1079 Arkwright Street is not eligible for inclusion in the National Register of

Historic Places. The analysis provided indicates the subject property does not meet any of the National Register Criteria for Evaluation because the building is in disrepair and is a “utilitarian multi-unit structure” (presumably multi-family residential) but “not an early nor distinct example.” The analysis also notes the building is “not known to be associated with persons significant or to have been the site of an important event.” However, the City provided no information about other properties in the APE beyond photographs and did not provide justification for reaching its conclusion for the subject property as required by 36 CFR 800.11(d). The City did not provide information about the original use of the property or the historic context(s) that led to its construction, including but not limited to historic contexts related to multi-family housing in Saint Paul.

We recommend the City document all architecture-history resources that are 45 years of age or older and located within the APE at a Phase I reconnaissance level to determine whether they may have significance. If research suggests significance under any of the National Register Criteria for Evaluation, the City should complete a Phase II evaluation to determine whether the property is eligible for inclusion in the National Register. The documentation must meet the requirements of the [Secretary of the Interior’s Standards and Guidelines for Identification and Evaluation](#) and Minnesota’s [Historic and Architectural Survey Manual](#) (August 2017).

Prior to the launch of the [Minnesota Statewide Historic Inventory Portal](#) (MnSHIP), digital property inventory forms were submitted to the SHPO Environmental Review Program in the same email as the survey report. Now that MnSHIP is fully functional and can receive inventory forms from project submitters, we request that inventory forms generated for reconnaissance or intensive-level surveys be submitted to the MnSHIP. We note that the City did not prepare an inventory form for the subject property and properties over 45 years old in the APE. For the subject property, we specifically recommend summarizing the relevant contexts in the inventory form narrative attached to the MnSHIP record as part of justifying the conclusions reached.

Archaeology

We agree that no further archaeological investigation is warranted for this project.

Continuing Consultation

When the inventory forms have been completed, please create inventory records in MnSHIP and submit them for our review. Then, because we are not automatically notified when forms have been submitted, please send an email to ENReviewSHPO@state.mn.us to notify us that the forms have been submitted to MnSHIP. Include the SHPO File Number in the Subject Line of your email.

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

Sincerely,

Leslie Coburn

Leslie Coburn
Environmental Review Specialist