

June 25, 2015

Commissioners and Staff
Saint Paul Historic Preservation Commission ("HPC")

Re: Rehabilitation of 2390-2400 University Avenue West and 735 Raymond Avenue
Saint Paul, MN 55114 & Addition of Raymond Avenue Flats

Page | 1

Ladies and Gentlemen:

We wish to clarify and correct certain comments made in the June 19, 2015, staff report ("Staff Report") for the above project.

Scope of Review

The purview of the Saint Paul HPC's design review is outlined in Section 73.06 of the City's Code of Ordinances. The ordinance lists three (3) design review "factors to be considered." Because the property is also in the University and Raymond local Historic District (the "District"), the purview also includes District Guidelines.

Regarding the "factors to be considered" by the HPC per the City Ordinance, the first limits a "proposed alteration or addition to an existing building" to those that will not "materially impair the architectural or historic value of the building." Contrary to the suggestion in the Staff Report, *the proposed addition will in fact enable the existing building to be preserved and restored.* The existing structure will be rehabilitated in a manner that will be compatible yet differentiated within the District and advance the goals of the station area planning and new transit oriented, TN zoning.

The second factor evaluates "the effect of any proposed new construction on the remainder of the building" in the case of partial demolition, and on "surrounding buildings and the economic value or usefulness of any proposed structures designated to replace the present building or buildings." Contrary to the comments in the Staff Report, the only physical alteration to the existing building will be the replacement of the existing, non-historic roof and removal of an inoperable chimney at the rear of the site. The existing building will not be demolished and will be rehabilitated more closely to its original construction following tuck pointing, re-opening of blocked up windows and replacement of windows with new windows that match the historic profiles. The proposed addition would then be built on top of the new roof but would take up only approximately fifty percent of its surface area. Most of the existing building's "interior core" is currently, and historically, an open parking area with some commercial space and it will not be "destroyed" in any way as the Staff Report suggests. It will be rehabilitated and continue with its original use. The commercial space along University Avenue will not be changed at all until viable uses are found. The assertion in the Staff Report that the proposed addition could be not be removed at a later date without damaging or altering the existing building is unsupported and untrue.

The third factor limits changes to "a proposed new building (or addition)" to those that will not "materially impair the architectural or historic value of buildings on adjacent sites or in the immediate vicinity within the historic preservation site." This factor does not mean that no new construction can be done in the District. The new Lyric apartment project located to the east of the existing building established the precedent that new, six-story ground-up construction is permitted in the District. Contrary to the implication in the Staff Report, *the proposed addition would have a positive*

impact on the surrounding area, much like the Lyric, by introducing compatible, yet differentiated new construction compliant with the guidelines and consistent with City of Saint Paul objectives for transit-oriented development near the Raymond Avenue LRT Station.

We would also like to point out that the Staff Report contains several assumptions with regard to the possible change from contributing to non-contributing status of the property and possible adverse impact on the District if the proposed addition is allowed. Our reputable local and national historic consultants have both strongly dismissed this as mere conjecture. There are a number of historic districts in the state that have lost contributing buildings due to substantial modification, expansion or demolition without changing the status of the district. Specifically in the 1,200 building St. Anthony Falls Historic District in Minneapolis where dozens of contributing buildings have been re-classified or demolished with no impact on the historic status of that district.

We hope you will take these comments and clarifications under consideration.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "T. Nelson", with a long horizontal flourish extending to the right.

Thomas M. Nelson
Chief Investment Officer