



July 6, 2017

TO: Saint Paul Heritage Preservation Commission, Attn: George Gause

FROM: Exeter Group LLC ("Exeter"), on behalf of property owner Flats Venture LLC ("Appellant")

RE: Appeal of Order and Decision of Saint Paul Heritage Preservation Commission ("HPC") Denying the Application (the "Denial") for a new storefront for the University Avenue retail spaces at C&E Flats ("Project")

2390-2400 University Avenue West & 735 Raymond Avenue, Saint Paul MN

Chair and Members of the Saint Paul Heritage Preservation Commission:

Exeter respectfully requests that the Saint Paul City Council reverse the decision of the HPC denying the proposed storefront replacement for the Project. For the reasons outlined below, the decision should be overturned and the replacement of the storefront allowed to proceed. The appeal consists of this writing, its attachments and other materials submitted to the City Council on or after this date (the "Appeal").

1. The Denial obstructs the Appellant's ability to comply with applicable building codes and lease its space.
2. The Denial does not follow the University-Raymond Commercial Historic District Guidelines that allow for storefront replacement when the existing is too deteriorated to save and the changes do not impact the defining characteristics of the building or the local historic district. The Appellant's proposal is well within this guidance.
3. The Denial is inconsistent with HPC's previous approval of entire window and frame replacement along the Project's Raymond Avenue façade where the windows and frames were also too deteriorated to save.
4. The Denial and the HPC Staff Report dated June 22, 2017 (the "Report") recommending denial contain misleading and inaccurate information that was prejudicial to the Appellant. The Denial and the Staff Report falsely claim that Appellant's proposed new storefront will "adversely affect the Program for the Preservation and architectural control of the University-Raymond Commercial District." This is entirely untrue as the Program is intended to guide change per the University-Raymond Commercial Historic District Guidelines, not prevent it. The Denial and the Staff Report prevent change by not following the guidelines and ignoring basic facts presented by the Appellant as to the severely deteriorated condition of the existing storefront, the need for the new storefront to be installed with its own integral structure and the need for the new storefront to be compliant with applicable building codes.
5. The Denial repeatedly ignores basic facts presented by the Appellant in pre-Application meetings, in the Application and at the June 22nd public hearing in front of the full HPC. The methods and interpretations for storefront replacement suggested by HPC in the Denial and in subsequent

emails from HPC staff, have been demonstrated by Exeter and its qualified architects and contractors to be either non-code compliant, physically impossible or both. The new storefronts are an integral structural unit and to attempt to piece together nominal amounts of severely deteriorated old material with code compliant new material will compromise both the physical integrity and the energy efficiency of storefront system in addition to leaving an esthetic that will be an awkward hodge-podge of old and new.

6. During the Appellant's pre-Application process with HPC staff, which the Appellant attempted to commence back in December 2016, HPC staff was repeatedly either slow to respond or entirely non-responsive. HPC staff has also been misleading in its communication and recommendations to Exeter as to what is allowable for storefront replacement. Exeter is required to seek HPC approval for certain elements of the Project per Saint Paul City Council's grant of appeal for the Project to Exeter on August 15, 2015 and memorialized in Resolution No. 15-1824. The non-responsive and misleading communication from HPC staff has resulted in costly and time-consuming delays and been prejudicial to the Appellant. This has also resulted in costly and time-consuming delays for an existing Saint Paul restaurant operator that desires to occupy the commercial space subject to installation of new, code compliant storefronts.
7. The Application for new, code-compliant storefronts has broad public support from residents, building owners, business owners and community organizations, including the Midway Chamber of Commerce. For the June 22nd public hearing, 75 pieces of public testimony were submitted and 71 were in favor of the Application. Exeter expects to receive further support from the Saint Anthony Park Community Council, which has been actively advocating for more restaurants in the neighborhood for several years.
8. The Denial prevents the Appellant from further delivering on the intentions made clear by the City of Saint Paul, the neighborhood, the local district and the billion plus dollar investment of Federal, State, County and City funds for re-development along the Green Line Corridor. The Project, with 119 market-rate apartments and 11,000 square feet of retail, is fully compatible with intentions of the *Raymond Avenue Station Area Plan* (adopted as part of the Saint Paul Comprehensive Plan) in pursuit of transit-oriented mixed-use residential and commercial density. The Appellant is delivering on that plan with the apartments, "C&E Flats", having opened on July 1st and a new 5,000 square foot brewery and tap-room opening along Raymond Ave in October, 2017.

Based on the above, and the attached supporting information, the Denial should be overturned in favor of a grant of this Appeal.

Very Truly Yours,

Thomas M. Nelson

Thomas M. Nelson
Principal
Attachments



**SUPPORTING INFORMATION FOR:
APPEAL TO THE CITY COUNCIL of SAINT PAUL, MINNESOTA OF HERITAGE
PRESERVATION COMMISSION DENIAL (the “Denial”) per HPC Resolution Dated June 23,
2017 (the “Resolution”) FOR FILE No. 17-015:**

**UNIVERSITY AVENUE STOREFRONT REPLACEMENT FOR C&E FLATS (the “Project”),
2400 UNIVERSITY AVENUE WEST**

Code Compliance

The configuration of Exeter’s proposed storefront replacement is necessary for basic, applicable building code compliance. The HPC Denial obstructs the Appellant’s ability to lease its 6,000 square feet of commercial space and egregiously recommends retention of an unsafe, non-compliant original entry in the third bay from the left.

The details and specific sections of the building code are noted in the attached memo dated 6/29/2017 from the Project’s architect of record, BKV Group. They include the need for recessed alcoves and minimum separation of entries.

The recessed alcoves are necessary for safe, code compliant egress from the building onto the public sidewalk and three of them have already been recessed. Without the alcoves, the egress doors will swing dangerously into the public right of way.

The Owner’s proposed layout reflects the needs of a restaurant tenant who would occupy the three most easterly bays. The code requires two egress doors a certain distance apart (greater than 1/3 the diagonal of the premises if sprinklered and ½ if unsprinklered), making it necessary to have recessed alcove entries doors in the first and third bays (counting from the left, or east). Alternatively, it is also possible that the Owner could find six users, one for each commercial bay, each needing its own code compliant, recessed alcove entry.

Commercial spaces, like these along University Avenue, are constantly changing over time and the six (6) separate commercial bays have been architecturally designed to accommodate anticipated change. The separate bays have been, and will continue to be, sub-divided in various ways in the future to meet leasing demand.

University-Raymond Commercial Historic District (the “Local District”)

The Denial and Resolution misinterpret what are the defining characteristics of the original building and what is allowable for storefront replacement under the University-Raymond Commercial Historic District Guidelines. They also falsely claim that the Appellant’s proposal will “adversely affect the Program for the Preservation and architectural control of the [District].”

Paragraphs 3, 4 and 7 of the Resolution repeatedly refer to “extant historic fabric” including “ornate coping and stamping...that has a high degree of scroll work stamped into the framing...”

Neither the aforementioned “coping” (which is in very poor condition, has already been compromised by extensive storefront changes, would be further compromised if Appellant attempted replacement and, most importantly, it is barely visible to the naked eye unless standing very close or viewed with high definition photography) nor any of the limited, remaining, severely deteriorated historic window and storefront materials referenced in the Resolution are defining characteristics of the property and they are in no way connected to the reasons why the building is classified as “contributing” to the Local District.

All buildings in the Midway Industrial District and the Local District, including the Project’s original 39,000 square foot first floor building, were evaluated in the extensive *Phase II Architectural History Investigation* (the “Investigation”) performed as part of the Central Corridor Light Rail Line for the Ramsey County Regional Rail Authority in September 2014. Pages related to the Project are attached.

The Investigation did not find the original building or any of its architectural details to be of significance. Instead, it notes the building is, “...an example of a truck sales and service property. It is not an outstanding example of a significant historical property type and does not meet the registration requirements for either an automobile or truck dealership or commercial building related to the Midway Industrial District theme.”

Even if there were historic materials of significance that could be rehabilitated or replicated (which is not possible per below), the Appellant’s proposal is well within the University-Raymond Commercial Historic District Guidelines that allow for alterations that offer minimal change to the defining characteristics of the building, its site, and environment.

Per the HPC, the Guidelines clearly state, “*Where original or early storefronts no longer exist or are too deteriorated to save, the commercial character of the building should be retained through: (1) contemporary design which is compatible with the scale, design, materials, color and texture of the historic buildings; or (2) an accurate restoration of the storefront based on historical research and physical evidence.*”

The defining characteristics of this contributing building are its original historic use as a truck maintenance facility and its architectural compatibility within the District. The Appellant is well within the guidance by proposing new storefronts that retain the scale, design, materials, color and texture of the original features of the building.

Contrary to the paragraph 8 of the Resolution, the new storefront would have no impact on the defining characteristics of the building or the Local District, and zero “adverse affect on the Program for Preservation and architectural control.”

Impossibility of Suggested Changes by HPC Staff and the HPC Resolution

The Appellant has consistently demonstrated in meetings with HPC staff, its Application and at the June 22nd public hearing that suggested changes to the Application are impossible either for non-compliance with code (see above), physical impossibility or both. The Appellant has provided evidence through extensive photography, performed selective demolition per the guidance of HPC staff, offered architectural expertise and presented contractor expertise in writing (attached). HPC staff and the Resolution have ignored the facts presented by the Appellant and continue to recommend solutions that have already been proven to be unattainable.

Specifically, in an email from HPC staff dated June 28th summarizing the public hearing, HPC staff recommended resubmittal of an application to address:

1. Transoms would be retained
2. Uniform window division in the new storefronts would support the transom divisions.
3. Include clarity on required egress

Addressing each of these recommendations in turn, recommendation #1 is impractical for several reasons. As Appellant noted at the June 22 hearing, replacing the existing storefront and leaving the existing transoms in place is impossible for structural reasons. The transoms sit atop a header that also supports the storefront window below. Due to the severely deteriorated condition of the header (evidenced in the photos submitted for the June 22 hearing), the header must be replaced. Because the transoms rely on this header for structural support, any replacement of the header is going to require replacement of the transoms.

Even if we ignore this fact, as Appellant noted at the hearing, the remaining structure supporting the existing transom windows has deteriorated to such a level as to necessitate replacement. Due to this deterioration, the existing transoms no longer serve as an effective barrier to either moisture or air, resulting in an increasingly rotted structure and creating significant energy efficiency issues.

According to Appellant's experienced contractor, were Appellant to somehow leave the existing transoms in place and attempt to add a new storefront system below it, the moisture and air intrusion issues would likely worsen significantly because discrepancy between the effectiveness of the old and new systems would likely cause an even greater disparity in temperature and permeability to develop between the two systems. This would simultaneously further damage the already inadequate transom section and undermine the effectiveness of the new section underneath the transoms.

Of particular concern to retail tenant prospects is that once the spaces are occupied and temperature controlled, this failure of transoms to act as a moisture or air barrier will result in condensation accumulating on the interior of the storefront, creating a fogging effect that obscures the interior of the space and defeats the purpose of a storefront.

Appellant's Application already incorporates recommendation #2 in that the window division in the proposed new storefronts match the transom division wherever possible. In the retail bays without entrances, the storefront window division matches that of the transoms. In the retail bays with entrances, the outer storefront windows match the transom divisions but due to the maneuvering clearance requirements for entry doors under the Americans with Disabilities Act (ADA), the entry vestibules and doors themselves must be slightly offset in a fashion that prevents a perfect alignment with the transoms above. Appellant cannot match the transom division above the entries without violating the relevant maneuvering clearance aspects of the ADA.

Staff recommendation #3, regarding Code Compliance, is addressed above. Appellant further notes that the attached letter from BKV Group architect is entirely consistent with the testimony of Appellant and BKV Group architect at the June 22 hearing.

HPC staff slow to respond, non-responsive and misleading

Per the conditional approval of the Project by the City Council, Exeter is required to seek HPC approval for specific items, including University Avenue storefronts. Exeter's "pre-application" process for the storefronts and other required conditions (pre-application meetings are strongly encouraged by HPC and HPC staff) have included no-shows by HPC staff at scheduled meetings, multiple periods in excess of four (4) weeks without responses to emails or phone calls, and changes to the primary Project contacts.

The non-responsive behavior by a public body with which the Appellant is required to work with by City Council resolution, combined with multiple staff contact changes have been costly, unnecessarily time consuming, confusing and prejudicial to the Appellant.



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Memorandum

TO: Tom Nelson
Exeter Group, LLC
Minneapolis & St. Paul

FROM: Mathew Nugent, BKV Group

COPY: Mike Krych, Jeremiah Smith, BKV Group

CLIENT: IAF 2400 University LLC

PROJECT: C & E Flats, 2400 University and Raymond Ave.
COMM. NO.: 1813.04

DATE: 06/29/2019

RE: **HPC Code Comment Response.**

At the HPC Meeting conducted on June 22nd 2017, the following issues were discussed concerning the submission for modifications to the existing University Commercial Space by the members:

1. The number of exit doors required.
2. Location of the required exit doors.
3. Recessed exit doors, in lieu of doors flush to the exterior wall

1. The number of exits

Since this is a Mercantile Occupancy the number of occupants is calculated at a rate of 30sf per occupant. The total gross area is 6549, with each bay being approximately 1100gsf. Therefore, if this was subdivided into 6 bays each bay would have an occupancy of 37 people and it would require its own exit. If the number of occupants is beyond 49 the space required 2 exits. (Table 15.1 2015 MBC)

The owner's application shows 2 +/- 3000 sf tenant spaces to accommodate a potential occupant that desires the three (3) eastern bays. By code, it presumed potential occupancy is greater than 100, therefore requiring 2 exits from the space. [These exits also are required to be separated by greater than 30% of the diagonal of the space. Due to the depth of the spaces placing the exits in the first and 3rd bays is the only compliant possibilities.]

2. Location of the required exit doors.

The tenant space is currently showing all the required exiting out the University Avenue Side. This required as the space is effectively infill and has no direct access on the other sides as there are other by tenant spaces. Exiting thru an intervening space is prohibited by the Minnesota State Building Code Section 1014.2 & 1014.2.1.

1014.2 Item 1 States Egress from a room or a space shall not pass through an adjoining or intervening room or areas, except where such adjoining rooms or areas and the area served are accessory to one or the other.

1014.2 Item 2 An exit access shall not pass through a room that can be locked to prevent egress.

1014.2.1 Multiple Tenants: Where more than one tenant occupies any one floor of a building or structure, each tenant space, dwelling unit an sleeping unit shall be provided with access to the required exits without passing through adjacent tenant spaces, dwelling units and sleeping units.

3. Recessed exit doors, in lieu of doors flush to the exterior wall

The project is showing doors recessed from the building wall along University in lieu of flush doors. Required exits must swing in the direction of travel, in this case out. This means they must be recessed from the facade to comply with:

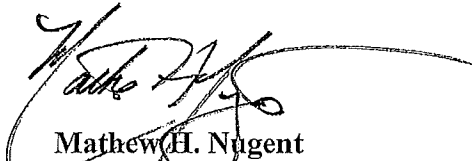
Section 3202.2 **Encroachments above grade and below 8 feet in height.**

Doors and windows shall not open or project into public right of way

Is it entirely possible in the future that each of the six (6) bays has its own occupant, in which case the only way for the owner to lease the bays is to be allowed to have recessed exit doors."

End of Memo

Sincerely,



Mathew H. Nugent
Partner BKV Group.

From: **Chris Lautenbach** chrisl@minneapolisglass.com 
Subject: C & E Flats- 2400 University Avenue storefront
Date: June 19, 2017 at 6:23 AM
To: Thomas Nelson thomasmnelson@mac.com
Cc: Travis Silvernale traviss@minneapolisglass.com, Stew Stoneback stews@minneapolisglass.com



Exeter Group LLC
Attn: Thomas Nelson

We are the subcontractor for Exeter Group LLC providing replacement of the storefront system at 2400 University Avenue West.

To properly replace the storefront, the existing kneewalls and horizontal header need to be replaced because the existing wood is either rotten, in disrepair or unable to support the new system. Removal and replacement of the existing brass finish is also not possible as the metal finish on the new storefront is an integral component of the system and given the age and condition of the existing brass finish we do not believe it can be removed and replaced without significant and irreparable damage. Even in the unlikely event that we were able to salvage some of the brass, the result would be a patchwork of old and new, diminishing the aesthetic and structural value of completed storefront.

Chris Lautenbach
Contract Manager



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PHASE II ARCHITECTURAL HISTORY INVESTIGATION FOR THE PROPOSED CENTRAL TRANSIT CORRIDOR, HENNEPIN AND RAMSEY COUNTIES, MINNESOTA

Submitted to:
Ramsey County Regional Railroad Authority

Submitted by:
The 106 Group Ltd.

September 2004

**PHASE II ARCHITECTURAL HISTORY INVESTIGATION FOR
THE PROPOSED CENTRAL TRANSIT CORRIDOR,
HENNEPIN AND RAMSEY COUNTIES, MINNESOTA**

**SHPO File No. 96-0059PA
The 106 Group Project No. 02-34**

**Submitted to:
Ramsey County Regional Railroad Authority
665 Ramsey County Government Center West
50 West Kellogg Boulevard
St. Paul, MN 55102**

**Submitted by:
The 106 Group Ltd.
The Dacotah Building
370 Selby Avenue
St. Paul, MN 55102**

**Project Manager:
Anne Ketz, M.A., RPA**

**Principal Investigator
Betsy H. Bradley, Ph.D.**

**Report Authors
Betsy H. Bradley, Ph.D.
Jennifer L. Bring, B.A.
Andrea Vermeer, M.A., RPA**

September 2004

MANAGEMENT SUMMARY

From May to August of 2004, The 106 Group Ltd. (The 106 Group) conducted a Phase II architectural history investigation for the Central Transit Corridor (Central Corridor) project in Minneapolis, Hennepin County, and St. Paul, Ramsey County, Minnesota. The proposed project is a multi-agency undertaking being led by the Ramsey County Regional Railroad Authority (RCRRA). The Phase II investigation was conducted under contract with the RCRRA. The proposed action is a Light Rail Transit (LRT) or Bus Rapid Transit (BRT) facility for the Central Corridor, a transportation corridor that extends approximately 11 miles between downtown Minneapolis and downtown St. Paul, Minnesota. The project will be receiving federal permitting and funding, along with state funding, and, therefore, must comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and with applicable state laws.

The history of the study of historical properties for the Central Corridor project is complex. The purpose of this Phase II investigation was to determine the eligibility of these properties, located within the area of potential effect (APE) between 29th Avenue, Minneapolis and Cedar Avenue, St. Paul, for listing on the National Register of Historic Places (NRHP). Following consultation with the Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU) and the State Historic Preservation Office (SHPO), 15 properties were slated for individual evaluation and 25 were evaluated as part of a Multiple Property Documentation Form (MPDF). In addition, The 106 Group was charged with identifying contributing and non-contributing properties within the APE for the proposed Prospect Park Historic District; and with revisiting properties determined eligible in a 1995 study west of 29th Avenue, Minneapolis and east/south of Cedar Avenue, St. Paul to determine whether they are still extant and maintain their integrity.

All properties are located in Sections 24 and 25 in T29N, R24W and Section 30 in T29N, R23W, Minneapolis, Hennepin County and Sections 29, 32, 33, 34, 35, and 36 in T29N, R23W; Section 31 in T29N, R22W; and Section 6 in T28N, R22W, St. Paul, Ramsey Counties, Minnesota. The Phase II architectural history investigation consisted of documentary research to determine the ownership and occupancy history for each property, to develop historical contexts, and conduct an intensive survey of each property to evaluate its integrity and to further evaluate its historical significance. Betsy H. Bradley, Ph.D. served as Principal Investigator.

Of the 40 properties studied for the current Phase II architectural history survey, seven properties are recommended as individually eligible for listing on the NRHP, one property is recommended eligible as contributing to the State Capitol Mall Historic District, and 14 properties within the APE are recommended eligible following evaluation for the Midway Industrial District of St. Paul Multiple Property Documentation Form (MPDF).

There are two contributing properties within the Central Corridor APE and the proposed Prospect Park Historic District.

The 1995 study included 46 properties in the areas west of 29th Avenue and east of Cedar Avenue, that were either listed on, previously determined eligible for listing, or the study determined eligible for listing on the NRHP. The APE has changed since 1995; the current project route ends in Minneapolis at the Metrodome station, where it joins the existing Hiawatha Line. In this adjusted APE there are four properties extant and with good integrity in Minneapolis (two of which are contributing to the Greater University Plan Historic District) and 15 extant and with good integrity in St. Paul (of which ten are contributing to the Lowertown Historic District). One property, the Power's Dry Goods Company Building (RA-SPC-5249), is no longer extant.

In summary, there are 61 NRHP properties within the APE for the entire Central Corridor, either individually NRHP eligible, listed on the NRHP, or contributing to one of the five historic districts and one MPDF.

5.10 GENERAL MOTORS TRUCK COMPANY BUILDING, RA-SPC-6301 2390-2400 University Avenue, St. Paul

5.10.1 Property Overview

The General Motors Truck Company Building was built in 1928 and was occupied by that firm for several years. It was designed by the architectural firm of Buechner & Orth.

5.10.2 Historical Context

This property was evaluated in relationship to the significant themes identified in the Midway Industrial District MPDF historical context.

5.10.3 Description

The General Motors Truck Company Building has two wings that wrap around the Twin Cities National Bank building at the corner of University and Raymond Avenues (Figure 3). A one-story showroom wing located on University Avenue has the appearance of a commercial building (Figure 35). The larger wing on Raymond Avenue is a taller one-story space (Figure 36). Both wings have flat roofs.

The University Avenue façade has six bays of show windows. The wall is faced with textured tapestry brick, and patterned brick defines flat piers that rise through the façade above a granite foundation. Cream-colored terra-cotta units with chevrons laid in a “T” shape mark the tops of the piers. A course of tiles and a corbelled brick cornice edge the parapet capped with a stone coping. Stacked courses and soldier courses of brick outline the large show windows, which have transom areas set off by masonry mullions. Entrances have been added to several of the showroom bays, which also have replacement sash. An awning covers the transoms of two bays. A tall brick chimney that rises from the rear of the building is visible from across University Avenue.

The Raymond Avenue wing also clad in brick has two vehicular entrances and some pedestrian doors in its long east wall. Several large windows and perhaps additional vehicle openings have been blocked. The southwest wall, faced with common brick, has two tiers of window openings. Most of the large pier-to-pier openings in the lower range are blocked with wood panels; one of these openings retains its industrial steel sash. Vehicular doors have been inserted into some of the bays at the west end of this wall. The upper range of smaller window openings retains its industrial steel sash. There is a parking area along the south side of the building.



FIGURE 35. RA-SPC-6301, FACING S



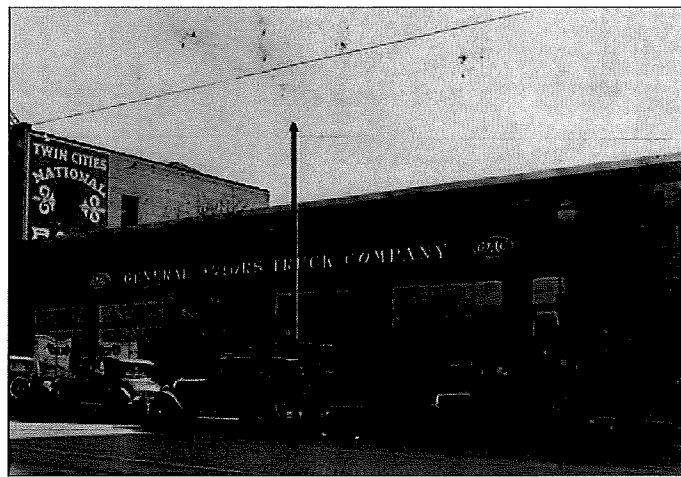
FIGURE 36. RA-SPC-6301, FACING SW

5.10.4 Property History

This building was erected by the General Motors Company in 1928. A historical photograph of the building indicates that a long sign band reading General Motors Truck Company was mounted just above the show windows (Figure 37). In 1930 the firm was the only occupant of the building. The 1950 Sanborn Map identifies the property as occupied by The Glendening Company. At that time the southern portion of the Raymond Avenue wing was used as a motor freight station; the northern portion was used for automobile and truck storage and repair (R. L. Polk & Co. 1930, 1950; Sanborn 1950). However, a 1952 list of vehicle-related businesses in the Midway district included GMC trucks at 2400 University Avenue (Midway Civic Club of St. Paul 1952-1958:1[2]:3).

The Architectural Firm of Buechner & Orth

The General Motors Truck Company Building was designed by the architectural firm of Buechner & Orth, one of the most prominent and prolific architectural firms located in St. Paul during the early twentieth century. Charles William Buechner (1859-1924) was born in Darmstadt, Germany and was educated in Germany, France, and Switzerland. After relocating to St. Paul in 1874, Buechner first worked as a surveyor for the St. Paul, Minneapolis & Manitoba Railway (later part of the Great Northern Railway). From 1883 to 1892, Buechner worked for the architectural firm of Clarence H. Johnston. After working in a partnership with John H. Jacobsen from 1892 to 1902, Buechner established the firm of Buechner & Orth. Henry W. Orth (1866-1946), a Norwegian-American, acquired an architectural education before immigrating to the United States. He worked with Frank W. Kinney in Austin, Minnesota, before forming the partnership with Buechner. After 1938 Orth practiced alone, but collaborated with the P. C. Bettenberg & Co. architectural firm on several church projects. During the early twentieth century, the firm's work included many prominent institutional and public buildings, and also many commercial buildings and residences (Buechner & Orth 1930; *SIPPP* 1946:20). This firm was known for its many public building projects in the Beaux Arts style that are described in Section 15.4 of this report.



Source: Minnesota Historical Society. Location No. MR2.9 SP3.1G p34

FIGURE 37. 1929 PHOTOGRAPH OF RA-SPC-6301

Buechner & Orth's many commercial buildings are clustered in St. Paul's downtown and Midway Industrial District. The downtown St. Paul buildings include the Arcade Building (1915), the Empress and Palace Theaters (1910), the Kendall Hotel and the Hotel Minnesota (1922). The Midway Industrial District buildings include the Northwestern Furniture and Stove Exposition Building (1906), the Simmons Manufacturing Company Warehouse (1909), and the Twin Cities State Bank (1914). The General Motors Truck Company Building (1928) commission was completed after Buechner's death. The firm also designed Fire Station No. 18, located on University Avenue, in 1908.

5.10.5 Significance

This property was evaluated as an example of a significant property type and in light of the significant themes identified in the Midway Industrial District MPDF historical context.

The General Motors Truck Company Building is an example of the truck sales and service property. However, the building has few physical attributes that demonstrate that historical use. The conversion of the University Avenue wing to a series of separate storefronts and the blocking of vehicular entrances and windows in the Raymond Avenue wing makes it difficult for the building to represent its historical use by the General Motors Truck Company. It does not meet the registration requirements for a property of this type. Also, there is a better example of this property type in the MPDF study area, the Mack International Truck Motor Company Building (see Section 5.4). The General Motors Truck Company Building does not have significance under Criterion A.

The General Motors Truck Company Building is not associated with any persons of historical importance and therefore is not recommended as significant under Criterion B. The property is not an outstanding example of an automobile sales and service building or a commercial building of the 1920s. It is not an important example of the work of the firm of Buechner & Orth. The General Motors Truck Company Building is not significant under Criterion C. The property has not yielded, nor is it likely to yield, information important in prehistory or history, and therefore is recommended as not significant under Criterion D.

5.10.6 Recommendation

The General Motors Truck Company Building is recommended as not eligible for listing on the NRHP. It is not an outstanding example of a significant historical property type and does not meet the registration requirements for either an automobile or truck dealership or commercial building related to the Midway Industrial District theme. The property, however, is considered eligible as part of the NRHP-certified historic district, the University-Raymond Commercial Historic District (see Figure 4).