

March 20, 2026

VIA E-MAIL

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

RE: Demolition of House at 633 Capitol Boulevard
Saint Paul, Ramsey County
SHPO Number: 2026-0482

Dear Mr. Gause:

Thank you for the opportunity to comment on the above project. Information received on February 18, 2026, has been reviewed under 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).

Definition of the Undertaking

We understand this project consists of demolition of the single-family house at 633 Capitol Boulevard in Saint Paul. No acquisition or redevelopment is reasonably foreseeable at this time.

Area of Potential Effects

We agree that the Area of Potential Effects (APE), as delineated on page 2 of the “Section 106 Historic Effect Review,” is appropriate to take into account effects of this project on historic properties.

Identification of Historic Properties

This property is located within an area surrounding the Minnesota State Capitol and regulated by the Capitol Area Architectural and Planning Board (CAAPB). As such, the CAAPB should be a consulting party to this Section 106 review, and identifications efforts conducted for 106 could help inform its review of the proposed demolition. In 2022, the *Historic Context Report for the Minnesota State Capitol Planning & Context Development Project*, prepared by The 106 Group, recommended 633 Capital Boulevard for reconnaissance-level survey. Additionally, a map (*Figure 1* of the Research Design) indicated that the parcel has moderate archaeological potential and recommended further archaeological study.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

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In the “Property Analysis” included in your submission, it appears that the St. Paul context study— *Neighborhoods at the Edge of the Walking City* (Mead & Hunt, 2011)—was not reviewed. The study indicates that the North End neighborhood, where this property is located, was settled by “working class residents employed at the nearby railroad shop...” The 2011 context study provides a neighborhood-wide historical framework that may reveal patterns of development, labor history, immigration, and housing typologies directly relevant to evaluating the property’s historical significance.

Archaeology

Page 4 of the “Historic Effect Review” indicates: “Archaeological resources are suspected to exist” at the project location. Based on the nature of the project and the 2022 context study, we recommend you hire a consultant to perform a **Phase I archaeological survey** to determine the potential for historic resources in the Area of Potential Effects. If, as a result of the Phase I survey, the consultant recommends further research, then a Phase II survey should be completed.

To submit an archaeology survey report for SHPO review, the consulting archaeologist must submit it through the [Office of the State Archaeologist \(OSA\) Portal](#). Guidance for the archaeologist is on the SHPO website:

<https://mn.gov/admin/shpo/surveyandinventory/manual/>

Architectural History

Based on the information currently available and the scope of this project, we recommend a **reconnaissance-level architecture-history survey** for properties over 45 years old in the APE. If, based on the results of the survey, an intensive-level evaluation of any of the properties is recommended, then that should be completed to determine National Register eligibility. The historian should evaluate the property(ies) within the framework of existing historic contexts, including those referenced above. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation.

The historian will need to summarize results in a report and create new inventory forms for each property in the [Minnesota Statewide Historic Inventory Portal](#) (MnSHIP). Instructions for using MnSHIP are at <https://mn.gov/admin/shpo/surveyandinventory/inventory/>.

Continuing Consultation

Once the surveys are completed, the archaeological report has been submitted to the OSA Portal, and the architecture-history inventory forms have been submitted to MnSHIP, you must notify the SHPO by sending an email to ENReviewSHPO@state.mn.us. The review time clock will start when the email is received. The email should include:

- The SHPO File Number (see “RE” line above under your name/address)
- The full archaeology report title, author, and report date
- Confirmation that the archaeology report has been submitted to the OSA Portal
- The architecture-history survey report

- Confirmation that architecture-history inventory forms have been submitted to MnSHIP
- Your agency's finding of effect (e.g., No Historic Properties Affected, No Adverse Effect, or Adverse Effect), based on the survey results.

Please contact Leslie Coburn, Environmental Review Specialist, at leslie.coburn@state.mn.us or (651) 201-3286 if you have any questions regarding our review of this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy Spong".

Amy Spong
Deputy State Historic Preservation Officer