

December 4, 2023

VIA E-MAIL ONLY

George Gause  
Heritage Preservation Supervisor  
St. Paul Planning & Economic Development  
25 4<sup>th</sup> St W  
St. Paul, MN 55102

RE: Demolition of 195 Goodrich Avenue  
St. Paul, Ramsey County  
SHPO Number: 2023-3314

Dear Mr. Gause:

Thank you for initiating consultation with our office regarding the above-referenced project. It 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).

Pursuant to 36 CFR 800.4-5 it is the responsibility of the federal agency or its delegated agent to define the undertaking, determine the area of potential effect (APE) for the federal undertaking, identify and evaluate historic properties that may be affected by the proposed federal undertaking, and assess effects to any historic properties.

While your submittal provides baseline information regarding the project, we will need additional information to understand how this project may affect historic resources. The following outline the four steps to analyzing a project under Section 106. The additional information needed from you to continue our review is in **bold type**:

Step 1: Define the Undertaking

From the materials provided, we understand this project entails demolition of the house at 195 Goodrich Avenue, St. Paul, and that no future development is anticipated in the foreseeable future. In her November 28, 2023, email to Luis Pereira, Sarah Beimers asked for clarification of the status of this proposed undertaking, since it didn't appear on his list of pending project reviews he sent to SHPO on November 22<sup>nd</sup>. We haven't received a reply to Ms. Beimers' request. **If this project is no longer considered a federal or state undertaking, please let us know.**

Step 2: Determine the Area of Potential Effects (APE)

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MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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

[mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■ [mnshpo@state.mn.us](mailto:mnshpo@state.mn.us)

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You have provided a map of the APE showing properties contiguous to and across the street from the subject property. We agree that this APE is generally sufficient to account for any changes in character or use of historic properties, if any such properties exist.

### Step 3: Identification of Historic Properties

The Section 106 process requires a reasonable and good faith effort to identify historic properties within the APE.

#### Architecture/History

The undertaking is demolition of 195 Goodrich Avenue (RA-SPC-08327), a house potentially eligible for individual listing in the National Register of Historic Places (NRHP)—as stated on the city’s survey form completed in 2011—and within the potentially NRHP-eligible Uppertown Historic District (RA-SPC-05588). Your September 15, 2023, project review request included the determination of “Historic Properties Affected” for the undertaking. **Neither the Uppertown Historic District nor 195 Goodrich Ave. have been formally evaluated for NRHP eligibility, and these evaluations would need to be completed in support of the city’s historic property identification and finding of effect.**

#### Archaeology

Due to the nature and location of the proposed project, **an archaeological assessment is recommended.** A review of *Phase IA Archaeological Resources Investigation of Proposed Changes to Portions of TH149, 7<sup>th</sup> Street to I-494, Ramsey and Dakota Counties, Minnesota* (SHPO Report# MULT-2016-26), suggests that many properties in this neighborhood had historic structures that are no longer extant. This 2016 study prepared by the Mississippi Valley Archaeological Center recommended additional archaeological survey related to the TH149 project to identify significant archaeological sites. The report includes Sanborn maps that suggest that the parcel at 195 Goodrich Avenue in Saint Paul had several different structures near the back of the lot (on the alley) at different times. It does not appear that any of those former structures are still standing. The archaeological investigation should be designed to determine whether any of these former structures may be present buried beneath the surface, determine their association with the structure that is proposed to be demolished, and to understand whether demolishing this structure would have an adverse effect on any archaeological sites within the same parcel.

### Step 4: Finding of Effect

**Summarize your assessment of this project’s potential to affect historic properties and document your agency’s finding** from among the following: 1) No Historic Properties Affected, 2) No Adverse Effect, or 3) Adverse Effect. (See 36 CFR 800.4(d)-800.5.)

Your review request didn’t provide any information regarding identification and engagement of other consulting parties, including Native American tribes, or public engagement in the Section

106 review of the proposed federal undertaking. The St. Paul Heritage Preservation Commission should be notified and provided an opportunity to review and comment on the proposed undertaking and its effects on historic properties as required under 36 CFR 800.4(d)(1). We also expect a reasonable level of public engagement/notification in the Section 106 review consistent with 36 CFR 800.2(d). **Please provide information regarding consulting party participation and public notification in any subsequent correspondence submitted to our office.**

Please submit the requested information to our dedicated project review email: [ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us) . Include the SHPO File Number in the Subject Line of your email.

We look forward to continuing our review of this project. If you have any questions regarding our review of this project, please contact Leslie Coburn, Environmental Review Specialist, at 651-201-3286 or [leslie.coburn@state.mn.us](mailto:leslie.coburn@state.mn.us).

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers". The signature is written in a cursive, slightly stylized font.

Sarah J. Beimers  
Environmental Review Program Manager