DEPARTMENT OF ADMINISTRATION
STATE HISTORIC PRESERVATION OFFICE

December 12, 2025 **VIA E-MAIL**

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 799 University Avenue West
St. Paul, Ramsey County
SHPO Number: 2026-0130

Dear Mr. Gause:

Thank you for the opportunity to comment on the above project. Information received on November 19, 2025, 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).

Definition of the Undertaking

We understand this project consists of demolition of the commercial building at 799 University Avenue West. Although the building has experienced damage due to a fire, the Order to Abate Nuisance Building (11/10/2025) attached to your project review request indicates that repair of the building is possible. You state that no known acquisition or future development is anticipated for this property.

Area of Potential Effects

We agree that the Area of Potential Effects (APE) as delineated and described on page 5 of *City of Saint Paul Section 106 Historic Effect Review* is appropriate to take into account effects of this project on historic properties.

Identification of Historic Properties

Archaeology
We agree that no further archaeological investigation is warranted.

Architectural History
Despite the information you provided about this property, we don't have enough information to agree that is it not eligible for inclusion in the National Register of Historic Places (NRHP). Further research is needed to fully understand this property's significance. For example, we note that the property is located in the historically African American community of Rondo in St. Paul and, in the mid-20th century, housed businesses owned by Chester "Chet" W. Oden, including the Ebony Lounge, known for hosting R&B artists.

Additionally, this property is across the street from the potentially historic Rondo Historic District (RA-SPC-12095), recently identified in a survey for another ongoing Section 106 review ("Rethinking I-94" Project) and awaiting review by our office. Historic contexts for that project have been developed and likely would be useful for an evaluation of this property; they include a geographic context of the Rondo neighborhood and a thematic contest of black history in the I-94 corridor. (See https://edocs-public.dot.state.mn.us/edocs_public/DMResultSet/Urlsearch?columns=docnumber,docname&folderid=37174101). Your list of historic contexts reviewed for this property's evaluation doesn't include *Saint Paul African American Historic and Cultural Context, 1837 TO 1975 Ramsey County, Minnesota* (The 106 Group, May 2017); we believe that context would be useful.

We recommend that an intensive-level (Phase II) architectural history evaluation be completed meeting the requirements of the Secretary of the Interior's Standards for Identification and Evaluation. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website https://www.mnhs.org/preservation/directory, and select "Historians" in the "Search by Specialties" box.

A stub record for this property has been created in the Minnesota Statewide Historic Inventory Portal (MnSHIP) under **Inventory Number RA-SPC-13554**. The consultant should submit an **updated** inventory form for the record RA-SPC-13554 in MnSHIP.

Continuing Consultation

Please submit the intensive-level evaluation report and your finding, based on the results of the evaluation, to ENReviewSHPO@state.mn.us.

Please contact Leslie Coburn at leslie.coburn@state.mn.us if you have questions regarding our review of this project.

Sincerely,

Amy Spong
Deputy State Historic Preservation Officer