

July 16, 2015

St. Paul Heritage Preservation Commission
24 West 4th Street
Suite 1400
St. Paul, Minnesota 55102

Re: 2390-2400 University Avenue/723 Raymond Avenue, St. Paul, Ramsey County, Minnesota

Dear Commission Chair:

Staff at the Minnesota Historic Preservation Office has been informed of a proposed alteration to a contributing building within the University-Raymond Commercial Historic District, a local historic district in St. Paul that has been certified for rehabilitation tax credits by the National Park Service.

Our understanding is that the single-story building located at 2390-2400 University Avenue may receive a five-story addition. Such a substantial alteration does not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties and is an adverse effect to the contributing building and the district as a whole. The inappropriate addition would force reclassification of the building's status from contributing to non-contributing. Continued alteration of the historic district in this manner has the potential to force re-evaluation of the district's certified status. Loss of the certified status will result in projects not being eligible for the federal or state historic rehabilitation tax incentives.

Our office has communicated with the developer concerning the adjacent building also under their ownership, the Chittenden and Eastman Building, which will benefit from the services of the proposed addition. The recent rehabilitation of the Chittenden and Eastman Building was certified for historic rehabilitation tax credits and is still under the federal recapture period (5 years from the certification of the project). If the proposed project at 2390-2400 University Avenue/735 Raymond Avenue is connected internally to Chittenden and Eastman within the recapture period, this may lead to the recapture of federal tax credits due to the detrimental effects the proposed addition has on both buildings and the certified local district.

If you have questions, please let me know.

Sincerely,


Denis P. Gardner
Minnesota State Historic Preservation Office
denis.gardner@mnhs.org
651.259.3451