

CITY OF SAINT PAUL
HERITAGE PRESERVATION COMMISSION STAFF REPORT

FILE NAME: 2390-2400 University Avenue/735 Raymond Avenue
DATE OF APPLICATION: June 4, 2015
APPLICANT: Exeter Group LLC, Thomas Nelson
ARCHITECT: BKV Group, Inc., Mike Krych
OWNER: IAF 2400 University LLC
DATE OF PUBLIC HEARING: June 25, 2015
HPC SITE/DISTRICT: University-Raymond Commercial Heritage Preservation District
CATEGORY: Contributing
CLASSIFICATION: Rehabilitation/Addition/Alteration
STAFF INVESTIGATION AND REPORT: Amy Spong
DATE: June 19, 2015

A. SITE DESCRIPTION:

The General Motors Truck Company Building at 2390-2400 University Avenue/735 Raymond Avenue was designed by Buechner and Orth and constructed in 1928. The one-story, flat roofed, commercial building wraps around the Twin Cities State Bank designed by the same firm. The University Avenue elevation's base is faced in St. Cloud granite and has square buff brick accents above the four storefronts and rhythmic buff brick 'T's' above the brick columns separating the storefronts. The Raymond Avenue elevation has two of the truck servicing bays remaining while the other five original bays have been infilled with brick and concrete or modified for window openings. Both street facing facades are clad in dark brown variegated texture brick rising to a brickwork cornice and a low parapet.

The building is representative of the many trucking companies settling in the University-Raymond Commercial Historic District between World War I and the Great Depression and was one of the largest automotive servicing buildings in the Twin Cities at the time of its construction. The building is categorized as contributing to the historic and architectural character of the University-Raymond Commercial Historic District which is significant for its development as the city's largest industrial neighborhood and a national transportation center. Many of the buildings are associated with the Minnesota Transfer Railway or the early trucking industry and are excellent examples of early twentieth-century factory, warehouse, and office structures. Many designed by prominent architects such as Buechner and Orth, Ellerbe and Round, and Toltz, King and Day. District buildings designed by Buechner and Orth are the Northwestern Furniture Exposition Building (1906), the Simmons Mattress Company (1909), Twin Cities State Bank (1914), and the General Motors Truck Company Garage (1928).

B. PROPOSED CHANGES:

The applicant proposes to construct a five-story, U-shaped structure into and onto the roof of the existing L-shaped building. The market rate apartment addition will be approximately 19,000 square feet per floor with amenities such as a gym, pool and indoor parking, which will be in the historic garage. The proposed height is 75 feet tall. The addition will be setback from the University (77 feet) and Raymond (8 feet) elevations and from the historic Chittenden and Eastman Building to the west (30 feet 9 inches). The new addition is proposed with both paired and single windows in an ordered pattern and main materials are metal and fiber cement panels in 3 main colors.

The applicant proposes some rehabilitation for the historic building mainly on the Raymond and south elevations. The University elevation will remain with commercial uses and the non-historic storefronts will remain. The rehabilitation for the Raymond and south elevations are

described in more detail in the application. Masonry will be cleaned and repaired and some of the blocked window openings will be reopened with new steel sash and insulated glass. Many of the existing non-historic pedestrian entries will be retained with new doors.

C. METROPOLITAN COUNCIL GRANT:

As part of the City's annual solicitation for potential Metropolitan Council grants, a call for ideas is sent out to all developers, community organizations, and other economic development partners asking if they have any potential grant applications for the Livable Communities Demonstration Account (LCDA), LCDA-TOD (Transit-Oriented Development), and Tax Base Revitalization Account (TBRA) and TBRA-TOD programs. This call went out in January 2015. Potential applicants were asked to fill out the City's pre-application form; pre-apps were due to the City on February 13, 2015. Exeter Group submitted its pre-app for an LCDA-TOD Development grant on February 13, 2015, asking for \$620,000 for a green roof, sidewalks, utilities and bike racks for the C & E Flats (now Raymond Avenue Flats) project. All pre-apps were reviewed by a PED staff team (no HPC staff), which then recommended to PED's Leadership Team on March 6, 2015 which applications should proceed to the Met Council process. The staff team recommended that C&E Flats (now Raymond Avenue Flats) proceed; the Leadership Team concurred. After this action, it was brought to the staff team's attention that HPC staff had some concerns about the impact of the proposed project on the integrity of the University-Raymond Commercial Heritage Preservation District and perhaps even its National Register certification (which would affect the ability of the developer to access historic tax credits). Further, the project had not gone through the HPC design review process yet. Given this information, the staff team recommended that Exeter hold off until the second round of LCDA-TOD grants, due in November 2015. By that time, it was reasoned, the project would be through the HPC process and, possibly, approved. The Leadership Team concurred, and met with Exeter representatives to explain the new strategy. In response to concerns from Exeter that waiting until November might jeopardize the need argument (since the project would be under construction) and would not mesh with the timing for certain upgrades (such as the green roof) and thus might result in those components being removed from the project altogether, the Leadership Team decided to allow the application to go ahead for Round 1.

PED staff met with Metropolitan Council staff on April 23 for preliminary discussions regarding all LCDA-TOD grants. There were two main items discussed regarding the C & E Flats (now Raymond Avenue Flats) proposal: the first was to demonstrate the TOD aspect of the project and show what makes this project different from others. For example reducing parking ratios and allowing for more bike racks. The second item related to the Historic District and Met Council suggested the use of an architectural style that is more consistent with the historical nature of the area.

D. HPC PRE-APPLICATION REVIEW:

HPC staff first met with the applicants on March 24, 2015 and was introduced to the project with similar plans the HPC reviewed during the Pre-Application review on May 14. Staff responded to the overall proposal and 1) expressed concern over the project as a whole and the amount of outreach the applicants did before talking with the HPC about the proposal, 2) discussed potential long-term consequences altering a contributing building with such a large roof-top addition, 3) made some specific suggestions to possibly minimize the negative impact (including: flip the U footprint so more of the massing is at the rear, change windows and siding to be more compatible, rethink the recessed area to not reflect the Sullivanesque façade of the historic C & E Building), and 4) discussed timing and the review process by the HPC. In mid-April staff emailed the applicant a link to *Preservation Brief #14: New Exterior Additions to Historic Buildings: Preservation Concerns* and encouraged careful review of this document as it

is a useful tool in helping to interpret and design additions to historic properties based on the Secretary of the Interior's Standards as well as the University-Raymond Commercial Heritage Preservation District design guidelines which are based on the same ten Standards.

The current proposal has not changed significantly from the Pre-Application reviewed by the HPC on May 14, 2015, but the drawings that were submitted at that time are included in this packet for reference. The unapproved minutes (to be approved at the June 25th Meeting) are included as an attachment to this staff report. There was a thoughtful discussion regarding the addition, impacts to the historic property and potential long-term impacts to the Historic District, materials, massing, setbacks and windows were the main items. The HPC discussed several issues already presented by staff and voiced concern of the negative impact the addition's size and massing will have on the Raymond Avenue buildings and viewshed which have a main street scale and character.

E. GUIDELINE CITATIONS:

Sec. 74.06.3. - Design review guidelines, purpose and intent.

(a) The following guidelines for design review serve as the basis for the heritage preservation commission's permit review decisions in the University-Raymond Commercial Historic District. The guidelines define the most important elements of the historic district's unique physical appearance and are intended to state the best means of preserving and enhancing these elements in rehabilitation or new construction. When applying the guidelines, the commission, in clearly defined cases of economic hardship, will also consider deprivation of the owner's reasonable use of property.

(b) The commission shall conduct its design review for all projects in the district according to the secretary of the interior's "Standards for Rehabilitation" (1995). These standards shall be applied to all district projects in a reasonable manner and take into consideration their economic and technical feasibility. The ten (10) standards are:

(1) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

(2) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

(3) Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

(4) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

(5) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

(6) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

(7) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

(8) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

(9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

(10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

(c) Restoration and rehabilitation.

(1) *Masonry and walls.*

a. *Use of materials.* Original masonry and mortar should be retained whenever possible without the application of any surface treatment. A similar material should be used to repair or replace, where necessary, deteriorated masonry. New masonry added to the structure or site, such as new foundations or retaining walls, should be compatible with the color, texture and bonding of original or existing masonry. Formstone, stucco and wood or metal siding or paneling should not be used.

b. *Cleaning.* Masonry should be cleaned only when necessary to halt deterioration or to remove graffiti and stains and always with the gentlest method possible such as low pressure water (under 300 psi) and soft bristle brushes. Brick and stone surface should not be sandblasted with dry or wet grit or other abrasives. Abrasive cleaning methods can erode the hard surface of the material and accelerate deterioration. Chemical cleaning products which could have an adverse chemical reaction with the masonry material such as acid on limestone or marble should not be used. Chemical solvents should not be used at all except for removing iron and oil stains. It is preferable to use water with a non-ionic biodegradable detergent. Mortar should be repointed and window frames should be caulked before cleaning.

Waterproof or water repellent coatings or surface consolidation treatments should not be applied unless required to solve a specific technical problem that has been studied and identified and determined to comply with applicable design guidelines. In general, however, coatings are frequently unnecessary, expensive, and can accelerate deterioration of the masonry.

c. *Repointing.* Repointing should be done on those mortar joints where there is evidence of moisture problems or when mortar is missing to allow water to stand on the mortar joint. Using pneumatic hammers to remove mortar can seriously damage the adjacent brick and only motorized tools that do not damage brick should be used. Vertical joints should be hand chiseled. When repointing, it is important to use the same materials as the existing mortar. This includes matching the color, texture, coefficients of expansion and contraction, and ingredient ratio of the original mortar mix, creating a bond similar to the original. A professional mortar analysis can give this information. Repointing with Portland cement mortar may create a bond stronger than is appropriate for the building materials, possibly resulting in cracking or other

damage. Old mortar should be duplicated in joint size, method of application and joint profile.

d. *Painting.* The original or early color and texture of masonry surfaces should be retained, including early signage wherever possible. Brick or stone surfaces may have been painted or whitewashed for practical and aesthetic reasons and paint should not be indiscriminately removed from masonry surfaces as this may subject the building to damage and change its appearance. If masonry surfaces were not originally painted or ever intended to be painted, they should not be painted.

(2) *Windows and doors.*

a. *Openings.* Existing window and door openings should be retained. New window and door openings should not be introduced into the principal elevations. Enlarging or reducing window or door opening to fit stock window sash or new stock door sizes should not be done. Infilling of window openings or installing new openings may be permissible on secondary facades if standard sizes approximate the size and proportions of the opening. Generally, a secondary facade will be considered as any facade not facing the street and not having the ornamentation and higher quality materials usually associated with street facades.

b. *Panes, sashes and hardware.* It is desirable to retain original windows and doors, but they may need replacement for functional reasons. Replacement is clearly acceptable for functional reasons if new materials closely match original materials. Different materials may be acceptable on a case-by-case basis. Window panes should be two-way glass. No reflective or spandrel glass is permitted. The stylistic period or periods a building represents should be respected. Shutters are generally inappropriate in the district. Missing or irreparable windows should be replaced with new windows that match the original in material, size, general muntin and mullion proportion and configuration and reflective qualities of the glass. Replacement sash should not alter the setback relationship between window and wall.

Heating and air conditioning units should not be installed in the window frames when the sash and frames may be damaged. Window installations should be considered only when all other viable heating and cooling systems would result in significant damage to historic materials. Window installations may be acceptable in minor facades.

c. *Storm windows.* Storm windows and doors should be compatible with the character of the building and should not damage window and door frames, or require removal of original windows and doors. Exterior storm windows should be appropriate in size and color and should be operable.

d. *Awnings and canopies.* Awnings and canopies should not be used when they conceal richly detailed entries and windows. Aluminum or plastic awnings shall not be used. Large lettering or font styles inconsistent with the historical and architectural character shall not be used on awnings. Awnings should have a traditional shape such as a tent shape or be rounded when the opening is arched.

e. *Lintels, arches, and sills.* Lintels, sills, architraves, pediments, hoods and steps should be retained or repaired if possible. Existing colors and textures should be matched when repairing these elements.

f. *Storefronts.* Original or storefronts determined to have historical, architectural or

engineering significance should be retained and repaired including windows, sash, doors, transoms, signage, and decorative features where such features contribute to the architectural and historic character of the building. 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. Storefronts or new design elements on the ground floor, such as arcades, should not be introduced which alter the architectural and historic character of the building and its relationship with the street or its setting or which cause destruction of significant historic fabric. Materials which detract from the historic or architectural character of the building, such as mirrored glass, should not be used. Entrances through significant storefronts should not be altered.

(3) *Roofs, cornices and other details.*

a. *Roof shape.* The original roof shape should be preserved. New skylights and vents should be behind and below parapet level. When the roof is visible from street level, the original material should be retained if possible, otherwise it should be replaced with new material that matches the old in composition, size, shape, color, and texture.

b. *Cornices and other details.* All architectural features that give the roof its essential character should be preserved or replaced. Similar material should be used to repair/replace deteriorating or missing architectural elements such as cornices, brackets, railings, shutters, steps and chimneys, whenever possible. If an accurate reconstruction of a missing cornice is not feasible, due to cost, structural issues or lack of pictorial documentation, then the intricacy of detail is least important for new elements at or near the roof line. The same massing, proportions, scale and design theme as the original should be retained.

(d) Signs and accessories.

(2) *Accessories.*

a. *Grills, exhaust fans, etc.* Grills, exhaust outlets for air conditioners, bath and kitchen exhaust fans should be incorporated into filler panels, if possible. They may be painted the same color as the filler panel.

(e) **New construction.**

(1) *Generally:* New construction refers to totally new structures, moved-in structures and new additions to existing structures. Any new construction should possess height, massing, setback, materials and rhythms compatible with surrounding structures. The reproduction of historic design and details is recommended only for limited cases of infill or small scale construction. Guidelines for new construction focus on general rather than specific design elements in order to encourage architectural innovation.

a. *Setback.* There are a variety of setbacks expressed in the University- Raymond Commercial Historic District. However, new setbacks should relate to adjacent historic buildings

b. *Massing, volume, height.* Most of the structures of the district are distinguished by their boxy profiles; preservation of this aspect is the most essential element for

maintaining district unity. New construction should be compatible with the massing, volume, and height, of existing structures in the historic district.

c. *Rhythm.* The rhythm in the University-Raymond Commercial Historic District can be found both in the relation of several buildings to each other, and in the relation of elements on a single building facade. Rhythm between buildings is usually distinguished by slight variations in height, windows and doors, and details, including vertical and horizontal elements. Rhythm may be accentuated by slight projections and recessions of the facade, causing the scale of the building to match that of its neighbors. The rhythm of new construction should be compatible with that of existing structures.

d. *Roofs, cornices.* New roof, and cornice designs should be compatible with existing adjacent structures. Generally, roofs in the district are flat. It is more important for roof edges to relate in size and proportion, than in detailing.

e. *Materials and details.* Brick and pressed brick, Bedford stone and Mankato-Kasota stone, terra-cotta, ceramic tile, concrete, metal and glass are the most commonly used materials in the district.

The materials and details of new construction should relate to the materials and details of existing adjacent buildings. New buildings in the district should possess more detailing than typical modern commercial buildings, to respond to the surrounding buildings and to reinforce the human scale of the district. Walls of buildings in the district are generally of brick with stone trim. They display the colors of natural clay, dark red, buff, and brown. When walls are painted, similar earthtones are usually used.

f. *Windows, doors.* Windows should relate to those of existing buildings in the district in the ratio of solid to void, distribution of window openings, and window setback. The proportion, size, style, function and detailing of windows and doors in new construction should relate to that of existing adjacent buildings. Window and door frames should be wood or bronze-finished aluminum.

g. *Parking.* The preferred location of parking lots is behind the buildings rather than in front or beside them. If street frontage is the only option, the lots should be screened from street and sidewalk either by walls or plantings or both. If walls are used, their materials should be compatible with the walls of existing adjacent buildings. Walls should be at least eighteen (18) inches high. Walls or plantings should be located to disrupt the street plane as little as possible.

h. *Landscaping, street furniture.* Traditional street elements of the area should be preserved. New street furniture and landscaping features should complement the scale and character of the area.

(C.F. No. 05-52, § 2, 2-23-05)

Sec. 74.06.4. - Guidelines for non-contributing and contemporary buildings.

(a) *Change to contributing status.* A building classified as non-contributing to the historic district but built within the period of significance established for the district that has been substantially altered may be reclassified as a contributing building, if it is returned to its original historic facade by means of restoration or replication.

(b) *Noncontributing and contemporary building additions and alterations.* Additions and alterations to noncontributing and contemporary buildings must be sympathetic and subordinate to original building and adjacent structures. These changes must help the original better fit its context. Guidelines for new construction shall apply to noncontributing and contemporary buildings.

(C.F. No. 05-52, § 2, 2-23-05)

Sec. 74.06.5. - Demolition.

Proposals for demolishing structures, while reviewed with special care by the heritage preservation commission, are not necessarily in conflict with district guidelines. When reviewing proposals for demolition of structures within the district, the heritage preservation commission refers to subsection 73.06(i)(2) of the Saint Paul Legislative Code which states the following:

In the case of the proposed demolition of a building, prior to approval of said demolition, the commission shall make written findings on the following: the architectural and historical merit of the building, the effect of the demolition on surrounding buildings, the effect of any proposed new construction on the remainder of the building (in case of partial demolition) and on surrounding buildings, and the economic value or usefulness of the building as it now exists or if altered or modified in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings.

(C.F. No. 05-52, § 2, 2-23-05)

Secretary of the Interior's Standards for Rehabilitation (1990)
New Additions to Historic Buildings

Recommended:

- Placing functions and services required for the new use in non-character defining interior spaces rather than installing a new addition.*
- Constructing a new addition so that there is the least possible loss of historic materials and so that character-defining features are not obscured, damaged, or destroyed.*
- Locating the attached exterior addition at the rear or on an inconspicuous side of a historic building; and limiting its size and scale in relationship to the historic building.*
- Designing new additions in a manner that makes clear what is historic and what is new.*
- Considering the attached exterior addition both in terms of the new use and the appearance of other buildings in the historic district or neighborhood. Design for the new work may be contemporary or may reference design motifs from the historic building. In either case, it should always be clearly differentiated from the historic building and be compatible in terms of mass, materials, relationship of solids to voids, and color.*
- Placing new additions such as balconies and greenhouses on non-character-defining elevations and limiting the size and scale in relationship to the historic building.*
- Designing additional stories, when required for the new use that are set back from the wall plane and are as inconspicuous as possible when viewed from the street.*

Not Recommended:

- Expanding the size of the historic building by constructing a new addition when the new use could be met by altering non-character-defining interior spaces.*
- Attaching a new addition so that the character-defining features of the historic building are obscured, damaged, or destroyed.*
- Designing a new addition so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character.*

- Duplicating the exact form, material, style, and detailing of the historic building in the new addition so that the new work appears to be part of the historic building.*
- Imitating a historic style or period of architecture in new additions, especially for contemporary uses such as drive-in banks or garages.*
- Designing and constructing new additions that result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location, or setting.*
- Using the same wall plane, roof line, cornice height, materials, siding lap or window type to make additions appear to be a part of the historic building.*
- Designing new additions such as multistory greenhouse additions that obscure, damage, or destroy character-defining features of the historic building.*
- Constructing additional stories so that the historic appearance of the building is radically changed.*

F. COMPREHENSIVE PLAN CONSIDERATIONS:

The Saint Paul Comprehensive Plan, adopted by the City Council in 2010, addresses the citywide visions and goals for future growth, development, sustainability, and historic preservation. For this project area, the Central Corridor Development Strategy and the Raymond Station Area Plan were also adopted to provide more area specific planning and strategies. They address employment centers for job growth, potential for transit oriented development (TOD), and how to allow for new development while maintaining, respecting and enhancing the already established character and qualities of the University-Raymond Commercial Historic District. The Raymond Station Area Plan is attached for review in considering the proposal.

This area is zoned T3 for traditional, mixed-use development. The applicants will need to obtain approval from the Zoning Committee and Planning Commission for a Conditional Use Permit (CUP) for height but an application has not been submitted. Current T3 zoning allows for up to 55 feet in height and proposed building is 75 feet. A CUP may be requested for up to 95 feet.

The findings below cite specific sections of the Raymond Station Area Plan with respect to the adopted University-Raymond Commercial Heritage Preservation District Design Review Guidelines (Leg. Code 74.06.3). Figure 2.4 of the Plan illustrates a concept model for 2030 for this area. While it was not meant to predict or prescribe the location and distribution of anticipated long-term investment it was meant to illustrate examples of transit-supportive developments. An updated map is attached which illustrates: the contributing buildings of the District, shows a majority of the contributing buildings are of a small scale (1 to 3 stories) and the new construction potential where there are noncontributing and vacant parcels in the District (footprints shown in acreage).

G. FINDINGS:

1. The site is located within the University-Raymond Commercial Heritage Preservation District and is categorized as contributing to the District. This District is formally certified by the National Park Service as meeting the criteria for listing on the National Register of Historic Places (This certification as a contributing resource proceeds the Phase II Architectural History Investigation for the Central Transit Corridor (2004) mentioned in the application as not demonstrating its original property). This certification allows developers who own contributing buildings to access both the federal and state historic tax credits for rehabilitation of historic resources. If the proposed addition moves forward, the building's status as contributing will be reclassified as a non-contributing building and future use of tax credits may not be possible. Certification was sought by the HPC (at the request of Dominion and Johnson Brothers Liquors) to incentivize property owners to sensitively rehabilitate their historic properties and take advantage of federal (and state) historic tax credits. For tax credit purposes, a building must be listed on the National Register or

certified as being eligible for the National Register. Only HPC's that are Certified Local Governments can request National Register certification of local heritage preservation districts, as they are required to use the Secretary of the Interior's Standards for Rehabilitation in their design review.

2. On February 23, 2005, the University-Raymond Commercial Heritage Preservation District was established under Council File No. 05-52 § 1 and Chapter 73 of the Legislative Code states the Heritage Preservation Commission shall protect the architectural character of heritage preservation sites through review and approval or denial of applications for city permits for exterior work within designated heritage preservation sites §73.04(4). The period of significance for the University-Raymond Commercial Heritage Preservation District is 1891 to 1941.
3. **Sec. 74.06.3(b)(1, 2, 9 and 10) Standards for Rehabilitation.** Historic buildings should be used for their original purpose or have a new use that requires minimal alteration to the building (1). Adding five floors of new residential units atop the building is not a *minimal alteration*. The new work is *differentiated from the old* but is not *compatible with the massing, size, scale, and architectural features* in order to *protect the historic integrity of the property and its environment*. (2). The addition will not retain and preserve the historic character of the University-Raymond Commercial Heritage Preservation District. (9). The new addition is not easily reversible as much of the core of the building would be destroyed and possibly exterior elevations if it were *removed in the future*. (10). *The essential form and integrity of the historic property and its environment would be impaired and does not meet Standards 1, 2, 9, and 10.*
4. **Sec. 74.06.5. – Demolition.** A large portion of the roof and interior core will be removed to allow for the new structure, as well as an original tall, brick chimney. Prior to any demolition, partial or whole, the HPC must make findings for the following:

A. *The architectural and historical merit of the building,*

The findings herein address that the building has architectural and historical merit which has been verified by the National Park Service when the locally designated Heritage Preservation District was certified in 2005 (boundaries and classifications) as being eligible for listing on the National Register of Historic Places. This certification means that all contributing buildings within the District have access to both the federal and state historic investment tax credits. The Park Service concurred with the City Council adopted map (CF No. 05-52 § 1) showing the General Motors Truck Company Building as contributing to the historical and architectural character of the District. The application references a 2008 survey of the building, but the most recent designation and classification is relevant, not the earlier 2008 survey.

B. *The effect of the demolition on surrounding buildings, or the effect of any proposed new construction on the remainder of the building (in case of partial demolition) and on surrounding buildings, and*

The findings herein state that the new construction will have an adverse impact on the historic and architectural integrity of the General Motors Truck Co. Building and that the nearby small-scale Twin Cities National Bank Building will also be adversely impacted. Much of the District's significance is the collection of small-scale buildings that are architecturally unique but are also unified with a consistent use of brick and stone and architectural styles from the late Nineteenth and early Twentieth Centuries. The addition will result in the reclassification of the building from contributing to noncontributing. This will likely be a permanent classification because if the addition were removed in the future (unlikely) much of the historic structure would be lost during the demolition.

C. *The economic value or usefulness of the building as it now exists or if altered or modified in comparison with the value or usefulness of any proposed structures designated to replace the present building or buildings,*

The application states that some reasons the University storefronts are vacant are due to lack of parking directly in front, a bus stop being in front of the storefronts and a lack of immediate residential density in the neighborhood. The application also states the recent addition of light rail lines on University has contributed to the decline of commercial and industrial uses with an increase in residential uses. The application proposes that these storefront spaces will be leased in the future but identifies no current plans or tenants or any repair or rehabilitation of the façade and spaces. The residential addition will not improve the long-term viability or use of the storefronts because there will still be no parking in front and a bus stop. The applicant did not indicate if they talked with Metro Transit to shift the bus stop in order to eliminate one challenge for storefront reuse. There are other businesses along University that have no parking including a new coffee shop across the street and a vintage store. The application states they purchased the building in 2012 as they were rehabilitating the adjacent C & E Building into rental housing. The last tenant, Loomis Armored, who had been in the rear garage portion for 40 years moved out in October of 2014. The University Avenue storefronts were most recently a martial arts studio and a theatre and those are now vacant. The application addresses their marketing efforts since July 2012 and there was only one “genuine prospect” but only wanted a small portion of the square footage.

The application does not provide rehabilitation and adaptive reuse estimates for just the building alone or the construction costs of the incompatible addition. There was also no information regarding the value of the building if sensitively rehabbed for an appropriate use versus the value of the partially rehabbed building with the large addition. The application states that \$2 million would be required to be spent on the rehab of the historic building in order to qualify for the federal and state historic investment tax credits. According to the National Park Service there are four factors in determining qualification for federal historic tax credits. One of the four is meeting the substantial rehabilitation test.

“In brief, this means that the cost of rehabilitation must exceed the pre-rehabilitation cost of the building. Generally, this test must be met within two years or within five years for a project completed in multiple phases. The cost of a project must exceed the greater of \$5,000 or the building’s adjusted basis.” (Technical Preservation Services)

According to Ramsey County Tax and Property Look Up Information for PIN 29.29.23.34.0064, 735 Raymond Avenue, there was a sale of the building on 6/5/09 for \$1,170,000 and a sale on **1/18/12 for \$1,971,000**. The estimated market values for tax purposes are: 2010=\$1,170,000, 2011=\$1,111,500, 2012=\$1,100,000, 2013=\$1,265,000, 2014=\$1,342,800 and for 2015=\$1,293,000.

A similar, yet smaller, building in the Schmidt Brewing Company Historic District (2011, Certified by NPS) is the Keg House (22,000 s.f.). It is a large one-story open space where that developer is using tax credits and adding a mezzanine to increase the leasable space for tenants. The proposed commercial spaces will support the nearby, detached density (residents) and is also along a transit corridor (West Seventh) to attract a larger region.

There were no estimates provided showing an appropriate adaptive reuse that realizes the full economic potential of the whole interior of the existing space if properly rehabilitated. Historic tax credits could be used (for the rehab of the historic structure) if there was a small, but subordinate addition that also met the Secretary of the Interior’s Standards.

- 5. 74.06.3(c) Restoration and Rehabilitation.** More detailed information is necessary to

determine full compliance with applicable guidelines. A more detailed window and door schedule should be completed to determine which openings are original and which openings are not. The existing, non-historic entries on the Raymond elevation should appear as extensions of the original window openings and have a more industrial character. The new garage doors should be more consistent with the early garage doors which were more solid in nature. Every effort should be made to restore original openings and close non-original openings. Currently, three bricked-in openings along Raymond are not proposed to be opened with windows, but rather using new brick to match the original brick. This does not comply with the guidelines. A new residential entry is proposed on Raymond Avenue with a double-door and canopy. Details were not provided of the canopy to determine full compliance with the guidelines.

6. **74.06.3(e) New Construction.** The addition as viewed from University and Raymond Avenues does have a simple boxy profile which is an important element to maintain in this commercial district. A distinction must be made between free-standing new construction (infill) and appropriate additions to historic buildings. The application states the HPC approved the Lyric which has now established a precedent for height, however, this is not how projects are reviewed and the applicable guidelines correctly applied. The application further states that if the General Motors Building were destroyed by fire or natural disaster, the HPC would approve a taller building. This is also not true as not all new construction should be built to the height of the C & E Building as its height is an anomaly in the District and the massing and height should be compatible with the 1, 2 and 3 story buildings that make up the majority of the District.

The Secretary of the Interior's Standards for Rehabilitation provide specific guidelines for additions and *Preservation Brief #14* further assists in reviewing rooftop additions in historic urban districts. The colors and stylized "recesses" still recall the neighboring C & E Building, but the addition should relate more to the General Motor Truck Company Building it's proposed to be constructed on, rather than the C & E. The applicant did change the name of the project from C & E Flats to the Raymond Avenue Flats, but the design does not recall the unique history and character of the General Motors Truck Building.

The applicant made few changes to the design since the Pre-Application Reviews on May 14th. The height, setbacks, footprint and materials have not changed in response to the HPC and staff comments and findings. The window pattern was modified and more colors were added to the metal panels which was not an item that was recommended by the HPC. Rather, earth-toned colors are recommended, but with a restrained palette.

7. **74.06.3(e)(1)(a) Setback.** The Standards recommend *designing additional stories, when required for the new use that are set back from the wall plane and are as inconspicuous as possible when viewed from the street.* The addition is set back from the wall planes, but is not inconspicuous when viewed from Raymond and University Avenues. Rooftop additions are not recommended for one, two, and three-story historic buildings given difficulties designing them as unobtrusive as possible, ultimately diminishing the historic structure and nearby structures, and negatively impacting important views. The shallow setback along Raymond Avenue will also have negative impacts on the contributing Twin Cities State Bank Building at the corner. Natural light will be impacted to the upper floors at the rear and possibly the side which may impact this contributing historic building's long-term use and viability. During the Pre-Application Review, the HPC had concerns about the small-scale retail corridor along Raymond Avenue and the impact the addition will have with such a shallow setback from Raymond.

74.06.3(e)(1)(b) Massing, Volume, Height. The proposal does not comply with guidelines for massing, volume and height as the rooftop addition will *result in the diminution or loss of the historic character of the resource, including its design, materials, workmanship, location,*

and setting. The addition will add *additional stories so that the historic appearance of the building is radically changed.* The new addition is designed so that its size and scale in relation to the historic building are out of proportion, thus diminishing the historic character. A Conditional Use Permit (CUP) will also be required for height and the application will need to be reviewed and approved by the Planning Commission.

The boxy massing which is *the most essential element for maintaining district unity* will be diminished for the General Motor Truck Building and the nearby historic buildings: Twin Cities State Bank and the C & E Building. An aspect of the boxy character is that the historic buildings maintain their overall height or step down at the back. The addition will “step up” at the back of the building. There are several other contributing one and two story buildings in the Historic District and if additional stories are incrementally added over time, this may result in an overall diminishing character of the District. See attached map.

8. **74.06.3(e)(1)(e) Rhythm.** There is a consistent rhythm with historic building facades facing University and Raymond Avenues with respect to setback, but there is variety in building heights (lack of rhythm). The rooftop addition is proposed at a height similar to the historic C & E Building to the west. The C & E Building is a significant historic building that can be seen from all sides given it is the tallest building along the southern stretch of University Avenue. Views of this building will be impacted with the addition. *Elements* of the new addition do not relate to the elements of the General Motors Truck Building or nearby buildings—mostly window and bay spacing, massing and the recesses on University and Raymond.
9. **74.06.3(e)(1)(d) Roofs, Cornices.** The historic building’s flat roof will be altered by adding a new large structure, however, the addition is proposed with a flat roof and simple cornice and relates to existing nearby roofs and cornices.
10. **74.06.03(e)(1)(e) Materials and Details.** The proposed metal and fiber cement panels and details do not *relate to the materials and details of existing adjacent buildings.* The new addition does not *possess more detailing than typical modern commercial buildings* which is recommended *to respond to the surrounding buildings and to reinforce the human scale of the district.* *Walls of buildings in the district are generally of brick with stone trim. They display the colors of natural clay, dark red, buff, and brown. When walls are painted, similar earth tones are usually used.* The panels are proposed to be in earth tones but do not relate to the brick of the General Motors Truck Company Building.
11. **74.06.3(e)(1)(f) Windows and Doors.** Often, the first floor windows differ from upper floor windows for multistory historic buildings in the District. Window openings also differ between primary, street-facing elevations to secondary, side elevations. Nearby upper floor windows of adjacent historic buildings have divided light double-hungs, Chicago-style windows (fixed center with side double-hungs), and further east multi-paned steel windows. The proposed addition windows do not relate to nearby historic windows or the windows on the historic portion in style, function, distribution, proportion and solid-to-void ratio. *The proposed pattern of the windows are not a traditional double-hung as seen in most of the adjacent buildings and have both horizontal and vertical orientations created both by the openings and the mullion patterns. The guideline states, window and door frames should be wood or bronze-finished aluminum and bronze aluminum is proposed.* The applicant did add a muntin pattern to the windows since the Pre-Application Review to make them more consistent with the steel windows on the historic property.
12. **74.06.3(e)(1)(g) Parking.** Parking for the residents is proposed on the inside of the structure which is consistent with its original use and screened from public right of ways, however, this is not considered a highest and best use for adaptive reuse and the vision planning outlined in the Raymond Station Area Plan. The Rayette Building in the Lowertown

Historic District was used as a parking ramp for many years until market conditions were right for rehabilitating the property into rental apartments (also utilized historic tax credits).

- 13. Raymond Station Area Plan.** The Plan addresses the significance of University-Raymond Commercial Heritage Preservation District as the commercial core of the St. Paul Midway. This foundation was laid in the late 1870s as the city's early railroad companies expanded service between the two cities. After WWI, much of the District's development reflected the growth of truck transportation (General Motors Truck Company Building, 1928). In the 1920s, over half the city's manufacturing plants were located in the Midway. The Plan calls for careful consideration for all future infill and intensification given how the significant historic attributes, including proximity to several modes of transportation, has preserved the strength of employment functions north, south and east of the station. The Plan calls for policy direction that future investment in Raymond Station Area "must build on and strengthen the qualities of the University Raymond Commercial Historic District." It further states:

"Preserving the integrity and character of the area's defining architectural history will be vital to the continued success of land use and development in the Raymond Station Area. Nothing in this plan should be deemed to contradict the University Raymond Commercial Historic District Design Review Guidelines, but should instead reinforce, and be read in conjunction with, this important legislative document."

- 14.** As proposed and designed, the rooftop addition will adversely affect the Program for the Preservation and architectural control of the University-Raymond Commercial Heritage Preservation District (Leg. Code §73.06 (e)). The proposal to partially rehabilitate two of the three facades was incomplete and did not make clear how the proposal for the Raymond Avenue façade restores the building's original character and integrity given some of inappropriate alterations in the recent past. In addition to adversely impacting the historic resource and reclassifying it from contributing to noncontributing, the full economic potential is still not being realized for the storefronts along University Avenue and a large portion of the rear which is planned for parking. The proposal is also not consistent with the Raymond Station Area Plan which supports new development but not at the expense of negatively impacting an historic property.

H. STAFF RECOMMENDATION:

Based on the findings, the information within the staff report, and attachments, staff recommends denial of the application to construct a five story addition atop the General Motors Truck Company building as submitted.

(This is mainly due to the massing of the addition that is not subordinate to the historic building, there were few changes made to the addition in response to the HPC Pre-Application Review, there is little/no rehabilitation or use identified for the University Avenue storefronts and the rehab plan for the Raymond elevation did not provide enough detail to ensure that original openings are being restored and that the new doors and canopy reflect and restore the building's original industrial character.)

I. ATTACHMENTS:

1. HPC Application, description, photos and plans
2. Draft minutes from the HPC Pre-Application Review, May 14th, 2015
3. Preservation Brief #14
4. Raymond Station Area Plan
5. District map showing contributing small scale properties and appropriate new construction potential
6. HPC Pre-Application Review drawings, May 14, 2015