



City of Duluth

411 West First Street
Duluth, Minnesota 55802

Meeting Agenda

Heritage Preservation Commission.

Monday, July 11, 2022

12:00 PM

Council Chamber, Third Floor, City Hall, 411
West First Street

1 Call to Order/Determination of Quorum

2 Public Hearings

PL 22-105 Proposed Demolition of 118 East First Street

3 Consideration of Minutes (June 13, 2022)

4 Communications

Duluth Water Treatment Plant, 8130 Congdon Blvd 4-13-22

5 Report of Final Disposition on Matters Previously Before the Commission

PL 22-090 Proposed Demolition of 102 East Superior Street (F.K.A. Astoria Hotel)

6 Reports of Officers, Staff and Committees

7 Consideration of Matters Regarding Commission Action

2022 Preservation Conference

8 Other Business

9 Adjournment

Heritage Preservation Commission
June 13, 2022 Meeting Minutes
Council Chambers – City Hall

1) Call to Order and Roll Call

Vice-President Jessica Fortney called to order the meeting of the Heritage Preservation Commission (HPC) at 12:00 p.m. on Monday, June 13, 2022.

Attendance:

Attending: Stacey DeRoche, Jessica Fortney, Brandon Hartung, Jess McCullough, and Sarah Wisdorf

Absent: Ken Buehler and Mike Poupore

Staff Present: Steven Robertson

2) Public Hearings

PL 22-090 Proposed Demolition of 102 East Superior Street (F.K.A. Astoria Hotel) – Steven Robertson gave an overview. Structure was built in 1905 and is a contributing structure to the downtown historic district. MN EAW rules state demo or movement of historic structures requires approval from the HPC, or an EAW, 106 review, or SHPO action. The application came in on May 18, 2022. Five items of correspondence were received and were shared with the commissioners in their packet. There is significant fire damage on the third floor of the building. Current owners bought the building in 2017 and have been plagued with the structure's history of lack of maintenance. There are no plans for a parking lot. They would like to demo the building for future development. According to the applicant it is more economical to tear down the building, then it would be to repair the structure. If the HPC makes a motion to approve, they will still need to get a wrecking permit from construction services. Any motion should have a reason behind it.

Applicant: Ann Stratioti addressed the commission. She is with ZMC Hotels. They operate local hotels, and have offices in Duluth. They refer to the building at 102 East Superior Street as the Bullseye Building. The site was purchased in 2017 as a good place for future development. Tenants were given month to month leases except for Huckleberry's which got one-year lease. The purchase of land for future development is not uncommon in the hotel industry. Early in 2021 one of the two water mains was leaking underground. The summer of 2021 major sewer issues were discovered and along with the needed roof and exterior repairs, it made them reconsider their plans for the building. The best course of action was to take it down. Major cracking and deterioration occurred. They have no intention of building a parking lot or ramp. Once the building is removed, they need to cap the dirt to prevent erosion. The cost of the building is valued at \$750,000. The cost to repair the building would be \$2.4 million. They feel the building is beyond its useful life and respectfully ask the UDC to consider their proposal and to note any future build would need to be approved by the HPC.

Bill Burns, legal counsel for the applicant, addressed the commission. He has lived in Duluth for most of his life. He has been involved in historic projects throughout Duluth. He feels with or without historic tax credits, he doesn't think it is feasible to save this building. The current owner did not allow the building to deteriorate. He requests that the commission authorize the demo of this building.

Commissioners: Stacey DeRoche has questions, but she would like to hear from the public first.

Public: Lori Melton of 4623 Gladstone Street addressed the commission. She is a member of the Duluth Preservation Alliance Committee. She is opposed. The Historic Art and Theater district was created in 2015. The Astoria hotel is in the middle of a historic district, and used to house three tenants who have been displaced. She urges the commission to deny the applicant's proposal and save the Hotel Astoria.

Miles Ringsred of 435 Leicester Avenue addressed the commission. He is an attorney in town for the Pastorette, and knows about the environmental laws that protect the building. There is either an EAW that is required, or the alternative is allowing the HPC to approve the process. He feels the process is according to city process and not state process. Several criteria need to be addressed by this commission; including mitigation. He has not seen evidence of this. He thinks the public should have time to review the documents, and it is just being put on the record today. He finds this concerning. He feels it will affect the historic district. Many contributing buildings have been destroyed including the carter hotel, the oriental grocery, and the Hacienda. If the city continues to allow developers to willy nilly tear down historic district buildings. The historic district itself is in jeopardy. Economic reasons itself doesn't warrant tearing down a building.

Bob Berg of 1051 84th Ave W addressed the commission. He is also a member of the Duluth Preservation Alliance Committee, and has been interested in Duluth history and architecture all of his life. He noted the building was built by a famous architect, and believes it is an important building to the downtown fabric. If the owners don't think repair is feasible, he hopes they will sell it to someone who does think repair is feasible.

Rod Raymond of 227 Fairmont Street addressed the commission. He owns the Fitgers Brewhouse, and restored the burrito union, which isn't a historic building, but is 105 years old. Also, the old Carlson book store, which now houses Black List Brewery. He is quite involved with Duluth's historic structures. He noted the condition of the old Carlson book store was horrible, but by using historic tax credits he was able to restore it. The smartest thing he could have done with all his buildings was to tear them down. He thinks restoration of the Old Astoria hotel is possible, and getting 40% back from tax credits is awesome. Putting up a vinyl hotel would just be horrible. He would like the HPC to slow down and take a look at the historic value. The historical vibe would be gutted if they lose this structure. He is opposed to demo of the building.

Linda Peplinski of 4231 Luverne Street addressed the commission. She is opposed. She doesn't agree with the attorney's view that this is an unsafe building for homeless people. She said the owner caused this situation by letting their tenants go.

Commissioners: DeRoche visited the building last week. It definitely needs work. She has some concerns. She thinks the owner selling it to someone who didn't want to save it was unfortunate. She agrees with Raymond's points about it is more economical to tear it down, but isn't always the best decision. She doesn't think ZMC has looked into purchasing tax credits to save the building. She is concerned about the re-districting. She also is leery about not seeing a future plan. The amount of money to shore it up will have to be done regardless of the outcome tonight. Stratioti disagreed and said as long as the building is standing, it does not have to be shored up. DeRoche thinks more needs to be done to offer the building to someone who wants to save it.

Jess Mccullough asked if the owner who purchased it in 2017 realized it was a historic district. Stratioti noted she knew it was an arts and entertainment district, but not necessarily a historic district. Duluth Marine Supply Building – didn't come in until 1935. Mccullough asked if the building is destroyed what is the plan? Stratioti stated there isn't a plan on paper yet, but thinks the original idea was to put a hotel there. The site has not been profitable. They will either need to build something, or sell it. Their intent is not to sell it.

Sarah Wisdorf asked staff why an EAW is not needed. Per Robertson, this is the first or second (mentioned Hacienda) historic structure demo to be handled this way. Staff was unaware of the gravity of demo in the national historic district. The process now includes four options: 106 review, ask SPHO to remove from the district, an EAW or CLG (HPC) review it. An example in the commissioners' packet showcases the city of Northfield and their hotel. Staff did not receive a comment back from SPHO. If the item is tabled, a reason needs to be shared. Wisdorf asked if they vote to approve demo, could they make conditions regarding taking pictures and giving landmark recognition. Robertson will research if conditions could be made.

Mccullough asked if the applicant has a ballpark figure of what a new building would cost. 2.4 million does not include replacing concrete floor or bringing the building up to ADA standards and doesn't include any interior work. She estimates 5-6 million to restore the building. They would never see a return on investment for that price. Even with tenants in there, the building was operating at a loss. If they decide to add a hotel in the future, it could cost as much if not more, but their return on investment would be better, because they would have more rooms to rent out and would get top dollar for events like Grandma's Marathon.

DeRoche asked how much of the 5-6 million dollars could be mitigated by tax credits? Burns noted tax credits are good, but it doesn't just come off the bottom line. DeRoche noted it all seems a big blurry. They are getting conflicting information from other historic building owners like Raymond. Robertson noted the state tax credit is sunseting this month. Vice-President Fortney noted historic preservation is her day job, and her hobby. She is on this board because she cares. Historic Districts are great, and even if a structure is non-contributing, it is still important. They still need to change their language. They need to support their contributing structures and she doesn't want to see this historic district delisted. Restoration would bring it back to 1905. She considers this a rehabilitation project to bring it back to 2015 when it was listed.

Fortney feels this is demolition by neglect. The owner needs to keep up with maintenance. She feels the city and this commission needs to stand up here. She reiterates a language change is needed for local landmark status, the national register, contributing and non-contributing buildings. They want to move forward with rehabilitation. She thinks the fire damage could be repaired and the fire was part of the building's history, which needs to be promoted. Demo doesn't fit in Duluth's greener plan. Bricks and metal going into landfill is not ideal. The greenest building is one that is already built. She would like to see the applicant hire an HPC specialist. They need to adhere to the future Historic Downtown Guidelines. Stratioti noted they tried to get the roof replaced in 2020, but due to the pandemic, things shut down. The roof continued to deteriorate. They asked a salvation expert to see what was worth salvaging, and they didn't see anything worth keeping. They would welcome reuse of the building if someone would be interested. She noted Raymond did a wonderful job on the Oliver Inn, but spent 2 million. To make it into a boutique motel she has no idea what that would cost. She will work on those numbers, if that is what is requested.



Planning & Development Division
Planning & Economic Development Department

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MEMORANDUM

DATE: July 6, 2022
TO: Heritage Preservation Commission
FROM: Steven Robertson, Senior Planner
RE: PL 22-090 and PL 22-105, Applications for the Demolition of Contributing Structures to the Duluth Commercial Historic District

On April 18, 2022, the city received a zoning application from the owner of 102-108 East Superior Street requesting HPC approval to demolish the structure, and on June 12, 2022, the City received a similar application from the owner of 118 East First Street also asking for HPC approval to demolish that structure.

According to the "Historic Resources of Downtown Duluth, Minnesota, 1872-1933", submitted to the National Register of Historic Places, 2005, 102 East Superior Street was constructed in 1905, and was known as Duluth Marine Supply. It is also known to citizens as the old Astoria Hotel, as well as the Old Town Antiques, Chinese Dragon, and the Bullseye Building. 118 East First Street was constructed in 1904 and was known as Gray Brother's Bakery. Both are contributing to the character of the downtown historic district, and information for both structures from the 2005 survey is included with this memo.

The revised administrative process required before the City of Duluth approves a demolition permit for a structure contributing to a historic district is clarified in Mn Rules 4410.4300 subpart 31:

Historical places.

For the destruction, in whole or part, or the moving of a property that is listed on the National Register of Historic Places or State Register of Historic Places, the permitting state agency or local governmental unit is the RGU, except this does not apply to projects reviewed under section 106 of the National Historic Preservation Act of 1966, United States Code, title 54, section 306108, or the federal policy on lands, wildlife and waterfowl refuges, and historic sites pursuant to United States Code, title 49, section 303, or projects reviewed by a local heritage preservation commission certified by the State Historic Preservation Office pursuant to Code of Federal Regulations, title 36, sections 61.5 and 61.7. This subpart does not apply to a property located within a designated historic district if the property is listed as "noncontributing" in the official district designation or if the State Historic Preservation Office issues a determination that the property is noncontributing.

Included with this memo is the cover letter from the property owner of 102 East Superior Street and structural engineering report from Northland Consulting Engineers (same information that was provided last month), and a structural engineering report for 118 East First Street was provided by MSA.

Written comment, suggestion, or recommendation from SHPO staff was requested for both projects, but information has not yet been received.

The July 11, 2022, meeting is a public hearing to be held at noon in the City Council chambers on the third floor for 118 East First Street (the public hearing for 102 East Superior Street was held at the June meeting). The process for a typical public hearing is:

- Short staff overview or summary on the project or zoning application,
- Comments or short presentation from the project proposer,
- Commissioner questions or clarifications on items presented by staff or project proposer,
- Public hearing, accepting testimony from members of the public,
- Public hearing is closed, and commissioner discussion and motion.

According to the bylaws:

10.1 Public Testimony. Any person desiring to speak to the HPC during an official public hearing shall be heard prior to any determination of the matter in question. Such testimony shall be accompanied by the person's name and address for the public record. Letters received in lieu of oral testimony shall become a part of the public record and be considered prior to any final determination of the matter by the HPC.

10.2 Time Limits. The president of the HPC may establish such time limits on testimonies as are reasonable to provide for an efficient meeting so long as all interested parties are given a chance to testify.

10.3 Termination of Hearing. Upon close of public hearing no further presentation shall be allowed except upon suspension of the rules.

After closing the public hearing and reviewing all the appropriate information, the HPC may:

- Make a motion to approve the zoning application (Certificate of Appropriateness) allowing the demolition. The motion will have to include findings to support the motion.
- Make a motion to deny the zoning application, denying the demolition. The motion will have to include findings to support the motion.
- Table the item until the August 8th meeting, but tabling the item should be accompanied by specific information requests to allow the HPC to take action on the zoning application at their next meeting.

Note that if the Certificate of Appropriateness is approved and the demolition of either structure is allowed by the HPC, the project proposer would still need to receive a wrecking permit from the City of Duluth, and follow any additional regulatory requirements (lead and asbestos removal, site security and safety, soil stabilization, public utility cut-offs, etc).

Decisions of the HPC, like the PC, are able to be appealed to the City Council within 10 calendars days of the decision.

United States Department of the Interior
National Park Service

**National Register of Historic Places
Continuation Sheet**

Name of property
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place of the large red sandstone head. A series of twenty-eight vertical brick corbels sit above a wide band of brick and support the red sandstone string course.

On the western façade, the first floor is composed primarily of a flat expanse of brick wall and red sandstone foundation stones that step up in response to the steep south/north slope of the site. The façade is enlivened by four columns of brick quoins that divide the façade into three bays. The northernmost bay contains a door opening with an oversized red sandstone head and two large window openings with heads formed from three brick voussoirs. The openings were filled with plywood panels at an unknown date. A matching window is located in the middle of the center bay, but it too is covered with plywood. The second floor mirrors the arrangement of the south façade with the exception of the outer two bays, which contain a pair of double-hung windows instead of the single opening.

- 30. Historic Name: Duluth Marine Supply**
Current Name: Old Town Antiques and Books/Hip Stuff/Chinese Dragon
Address: 102-108 East Superior Street
Date: 1905
Architect: unknown
Contributing

This is a two-story painted brick commercial building sited on the southeast corner of the intersection of Superior Street and First Avenue East. The building has a rectangular footprint with its primary façade on Superior and a secondary façade facing First Avenue. Four cast iron columns from the original storefront system are visible at the first floor level, but much of the north storefront has been altered from its original appearance through the insertion of new aluminum frame storefront windows and doors, new bulkheads, and new canopies and plywood panels with signage that cover the transoms. A continuous series of pressed metal panels was attached to the brick above the transom level, providing a visual separation between the first and second floors.

The second floor of the main façade is divided into three bays, two smaller outer bays articulated by brick quoins and a much larger center bay that is characterized by six slightly recessed individual bays. The two outer bays have two window openings each of which holds a new fixed aluminum frame window with a cut stone sill and a large flat brick arch with a thin stone keystone. A small rectangular brick recess is positioned immediately above each window, with a cut stone sill and a series of four horizontal corbels at the head. Two small elliptical recesses flank the rectangular panels, with frames formed from brick headers and a narrow stone keystone mirrored at the top and bottom of the frame. Each recess in the central bay contains a new fixed aluminum frame window sitting on a cut stone sill that extends the full width of the recess. The head is made up of a flat brick arch with a narrow stone keystone that extends through the center of a projecting segmental arch resting on the flat arch. A row of six vertical brick corbels finish the top of the recess, which steps out to a flat brick panel that is capped by a serrated profile below a projecting metal cornice. There is no clearly defined parapet (the result of a fire in 1929 that destroyed the parapet), and the wall is simply terminated with a thin metal coping.

The west façade slopes down to incorporate a third story at the rear or south end of the building, but this is largely hidden by a large pedestrian ramp placed immediately adjacent to the building. The façade is roughly divided into three bays, with the northernmost bay representing a continuation of the north façade onto the west. The northernmost bay is a compilation of features found on the front façade, with aluminum storefront windows and

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National Park Service

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canopies at the first floor, and brick quoins defining the edges of the second floor bay. A single new fixed aluminum frame window has a cut stone sill and a large flat brick arch with a narrow stone keystone. A row of brick corbels sits below the same serrated profile and metal cornice seen on the front façade. The same treatment is repeated at the southernmost bay at the second story level. The first floor is largely unarticulated, with five fixed aluminum frame windows piercing the wall in the five southern bays. The central portion of the second floor contains nine window openings with cut stone sills and brick flat arches with stone keystones. The openings are filled by a mix of materials, including new aluminum frame fixed windows, plywood sheeting and smaller fixed window units surrounded by plywood infill. Three horizontal brick corbels lead up to a long parged strip at the top of the brick wall, most likely resulting from the removal of the pressed metal cornice in 1971.

- 31. Historic Name: NA**
Current Name: Parking Ramp, Fond-du-Luth Casino
Address: 107-109 East Superior Street
Date: 1987
Architect: unknown
Non-contributing

This is a four-story red brick parking structure serving the adjacent Fond-du-Luth Casino. It does not fall within the period of significance for the historic district. The construction of the building resulted in the demolition of the Oppell Block, constructed in 1889 for Oppell Dry Goods and designed by noted Duluth architect, Oliver G. Traphagen.

- 32. Historic Name: Sears Parking Lot**
Current Name: Muffler Clinic
Address: 110-116 East Superior Street
Date: 1923
Architect: unknown
Non-contributing

This is a one-story service building with an L-shaped plan containing office space and seven garage bays. Due to alterations, it is considered a non-contributing building in the historic district.

- 33. Historic Name: Peterson Buffet**
Current Name: Lake Place Building
Address: 118 East Superior Street
Date: 1911
Architect: unknown
Contributing

This two-story limestone Neo-Classical Revival building with a rectangular footprint originally was constructed as a restaurant and converted to a beer garden in 1941. The sidewall exposed on the west façade has been parged with a stucco-like material at an unknown date. The first floor was radically altered from its original appearance in 1949 through the addition of new wood frame fixed windows and a leaded fan light, a new single light wood door, new stucco panels, cast details and facing over the original limestone, and new polished granite bulkheads.

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**Architect: unknown
Contributing**

This simple tan brick building with a long, narrow rectangular plan was originally constructed as the Union Fur Company in 1922 with two floors of residential units above. The commercial storefront at the first floor was later converted to use as the First Street Exchange Pawn. The storefront has been altered through the removal of the original entry doors, windows, bulkheads and transoms, now replaced with aluminum storefront windows, a set of aluminum double doors, and large plywood signage panels. The secondary entry door providing access to the upper floor residential area has been replaced with a new hollow metal paneled door. The second and third floors of the front façade remain largely intact, with two pairs of two 1/1 double hung wood windows on each floor. Aluminum storm windows have been added on the exterior of each window unit. Each window pair is joined by a broad, flat wood mullion and rests on a plain cast concrete sill. The flat brick façade is relieved only by a narrow pressed metal cornice below a low brick parapet wall that exhibits moisture damage. Cast concrete coping tiles cap the parapet.

The separate one-story Thorsell-Nesgoda Garage building was constructed at the rear of the property in 1922. The low, concrete block building has a rectangular plan that is oriented along and east-west axis, and is joined to the rear of two adjacent buildings. On the east it abuts the rear of the Wabasha Bookstore, but does not appear to be physically linked to it. On the west and south it is joined to the Duluth Family Sauna.

**101. Historic Name: International Harvester Company
Current Name: Wabasha Bookstore/Fuzzy's Place
Address: 114-116 East 1st Street
Date: 1924
Architect: unknown
Contributing**

This small one-story commercial building has a long, narrow footprint that adjoins, but is not linked to, the Thorsell-Nesgoda garage building at the rear of the adjacent western lot. Originally constructed for the International Harvester Company, it functioned as Moose Lodge #505 during the 1970s and 1980s, before being sold and converted to its current uses. While the original reddish-brown wire-cut face brick forming the "frame" for the storefront is intact, the bulk of the façade is a large central storefront opening that has been modified with the introduction of new aluminum entry doors, vertical wood siding, vinyl tile over a curved plywood wall, a small amount of brick facing, and a new vinyl awning. A flat band of cast concrete separates the storefront from the large stepped brick parapet, which is framed in its entirety by a stepped band of cast concrete, which also serves as the parapet coping along the upper edge. A large backlit plastic sign has been attached to the center of the parapet.

**102. Historic Name: Gray Brothers Bakery
Current Name: Duluth Auto Sales
Address: 118-120 East 1st Street
Date: 1904
Architect: J.J. Marberry or John J. Wangenstien
Contributing**

United States Department of the Interior
National Park Service

**National Register of Historic Places
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This is a Renaissance Revival style two-story commercial structure set on a deep lot with a long, rectangular plan and exposed sidewalls of common brick. The first floor is composed of two outer brick piers with flat red sandstone bases and details, which frame a large storefront opening. No original material from the Gray Brothers Bakery survives, replaced with new infill materials in 1937 when the function was switched to auto sales. Diagonal wood siding covers much of the storefront and transoms on the western half of the first floor, with vertical wood siding, a wood shingled canopy and stone veneer facing on the eastern half. Two paneled hollow metal doors, a hollow metal sidelight, a new overhead door, and two fixed aluminum frame windows have been inserted into the storefront. A full width pressed metal cornice separates the first floor from the second.

The second floor is divided into three bays, with the center bay slightly set back and pierced by a row of four single-hung wood frame windows with new aluminum storms. Each window rests on a red sandstone sill and is topped by a half round brick arch with a long, thin red sandstone keystone framing a tinted plaster panel decorated with a garland molded in low relief. Only three inset panels survive, and appear to be badly deteriorated from moisture damage. The outer two bays are defined by large, tightly-spaced, brick quoins on each edge framing a single double hung 1/1 wood frame window with a red sandstone sill and brick flat arch head with a prominent brick keystone. Three projecting flat brick bands decorate the upper portion of the second floor below a band of wide brick dentils and a full width pressed metal cornice. A low brick parapet capped with concrete coping stones terminates the façade.

103. Historic Name: Northwest Radio
Current Name: Viking Micrographics
Address: 123 East 1st Street
Date: 1950
Architect: Giliuson and Ellington
Non-contributing

This is a two-story cream brick building constructed in 1950 for Northwest Radio by Giliuson and Eliingsen architects. They also provided the small two-story addition on the east in 1953. The recessed entry door with its cantilevered metal canopy is original to the period of construction, but several windows have been replaced with new casement units or glass block. This building falls outside the period of significance for the historic district.

104. Historic Name: Model Laundry
Current Name: First Street Exchange Pawnbroker
Address: 126 East 1st Street
Date: 1911
Architect: E. H. Branton
Contributing

This three-story commercial structure has a red-orange brick façade with common brick sidewalls and a small one-story brick addition at the rear. Traces of historic painted signage remain on the west façade. The first floor of the primary façade is composed of a cast iron storefront framed by flat brick piers that are highlighted by rough-faced red sandstone banding at the base, middle and top. Little remains of the original storefront, with the exception of the two central iron columns and the large steel head beam. As part of a 1996 renovation, new

MOTION/Second: Wisdorf/Mccullough table for: 1) More information from staff on the EAW, 2) More specific numbers from the applicant on repairs, 3) Feedback from SHPO and 4) Is there mitigation they can request as a condition of dem.

VOTE: (5-0)

3) Consideration of Minutes

April 11, 2022 Regular HPC Meeting

MOTION/Second: Fortney/Wisdorf approved the minutes with a minor edit on a typo

VOTE: (5-0)

4) Communications

Minnesota Historic Tax Credit Ending June 30, 2022 – Per Vice-President Fortney – There is more talk that is could come back in September. Current requests will be grand-fathered in.

City of Bemidji seeking input on Historic Commissions – Bemidji would like to include members who are invested in the city, but don't live in the city. Fortney asked commissioners to look it over, and maybe they can draft a letter for the next HPC meeting.

5) Report of Final Disposition of Matters Previously Before the Commission –

Lincoln Park Improvement Project MOA – Cliff Knettel city senior park planner addressed the commission and gave an overview. They are getting close to finalizing the plan and having it go out for bid. The MOA (Memorandum of Agreement) will go to the city council tonight, and will be routed for signature from all parties. They are pursuing the listing on the national register.

MOTION/Second: Wisdorf/DeRoche approved the Lincoln Park Improvement Project MOA

VOTE: (5-0)

6) Reports of Officers, Staff and Committees

Wisdorf gave an overview of the planning commission's next meeting. They will be voting on the need for a Lester Park EAW.

7) Consideration of Matters Regarding Commission Action

None at this time.

8) Other Business

None at this time.

9) Adjournment

Meeting adjourned at 1:30 p.m.

Respectfully,

Adam Fulton – Deputy Director
Department of Planning and Economic Development

**Application for
CERTIFICATE OF APPROPRIATENESS
for Duluth Heritage Preservation Landmarks and Districts**

Please complete this application as it pertains to your project. Attach all information required, including a scope of work form.

Location of Building: 118 East 1st Street Duluth, MN 55802
(Street Address) (City, State) (Zip Code)
None listed Unknown
(Historic Name) (Architect Name(s) - if known)

Owner: Kevin Ruhnke 4925 Haines Road, Hermantown, MN 55811
(Name) (Street Address, City, State, Zip Code) (Daytime Phone)

Applicant: Jeff Anderson, PE 332 W. Superior, #600, Duluth, MN 55802 (218) 499-3175
(Applicant's Name, if other than owner) (Street Address, City, State, Zip Code) (Daytime Phone)

Owner's Signature: _____ **Date:** _____

TYPE OF WORK PROPOSED

- Exterior Restoration Addition to Building Landscaping Signs New Construction
 Interior Restoration (COA may not be required - please check building's preservation plan)

EXTERIOR ALTERATIONS (CHECK ALL THAT APPLY)

- Windows
- Doors
- Siding
- Roof change
- Chimney
- Lighting
- Facade
- Other

Checklist of items needed for application:

- Scale drawings of all building elevations impacted by change
- Photos of current condition of all building elevations impacted by
- Detailed specifications and scope of work
- Materials to be used (color number, sample of material & that which is being matched, name of manufacturer & material)
- Detailed drawings of new windows, doors, or other features in scope of work

Description of proposed changes:

Demolition of the building

Reason for changes: Building was damaged in a fire in November 2020 and sustained significant damage including roof and second floor collapse. The damage is too severe for restoration and demolition is the best option for the building.

Location of changes on building: _____

ADDITION TO BUILDING

Description of addition:

Reason for changes: _____

Location of addition on site: _____

Reason for addition: _____

Size: _____

(Number of Stories) (Length) (Width) (Height)

Architect: _____ () - _____
(Name) (Street Address, City, State, Zip Code) (Phone)

Contractor: _____ () - _____
(Name) (Street Address, City, State, Zip Code) (Phone)



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June 10, 2022

Mr. Kevin Ruhnke
4295 Haines Road
Hermantown, MN 55811

Re: 118 1st Street East Building Condition Evaluation
Duluth, Minnesota

Dear Mr. Ruhnke,

MSA has completed a review of the St. Louis County Parcel #010-0930-00640 located at 118 1st Street East, Duluth, Minnesota 55802. The site location is shown on the attached **Figure 1**. In November 2020, a fire severely damaged the building on the property causing significant damage including the collapse of the roof and second story of the building into the first floor. MSA conducted a inspection of the building to determine the general extent of the damage and to determine the best course of action for the continued use of the property.

The onsite building at the property consists of a 5,500 square-foot, three-story retail store that was built in 1924. A brief historical search did not identify any historical names associated with the building. Based on discussions with the current owner of the property, the building was used for general storage of clothes and other miscellaneous retail goods prior to the fire in November 2022. Adjacent properties consists of an adult bookstore to the southwest, an elevated parking garage to the northeast, an alleyway to the southeast and 1st Street East to the northwest. Site details and area features are shown on **Figure 2**.

An inspection by MSA personnel observed that the building is currently vacant with no roof or windows. There is a large amount of debris located on the first floor consisting of the former contents of the building and debris from the collapse of a portion of the second story and all of the roof. The brick outer walls of the building are still relatively intact, but no other major structural elements of the building were visible. The first-floor window and door openings have been boarded up to prevent trespassing. No interior insulation, plumbing or other intact building feature or amenities were observed during the inspection. A photographic log documenting the conditions encountered during the building inspection is included as an attachment to this letter.

The fire and subsequent collapse of the roof and partial collapse of the second story have caused extensive damage to both the interior and structural integrity of the building. There does not appear to be sufficient remaining structural or utility components to attempt renovating the building and additional weaknesses may be present that were not identified during the inspection. Based on the condition of the building observed during the inspection, MSA recommends demolition of the building as it would be more economical and feasible to build a new structure than to renovate the existing building. Please contact me at (218) 499-3175 or jkanderson@msa-ps.com if you have any questions or need any additional information.

Sincerely,
MSA Professional Services, Inc.

A handwritten signature in black ink that reads "Jeff K. Anderson". The signature is written in a cursive, flowing style.

Jeff Anderson, P.E.
Senior Team Leader - Environmental
jkanderson@msa-ps.com | +1 (218) 499-3175

Page 2

Mr. Kevin Ruhnke
Hermantown, MN 55811
June 10, 2022

Attachments: Figure 1 – Site Location Map
Figure 2 – Site Plan View (aerial background/aerial view)
Photographic Log

FIGURES



Print Date: 6/10/2022
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Project Location



0 1,000 2,000 Feet



Data Sources: USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed August, 2021.

FIGURE 1

PROJECT LOCATION

118 EAST 1ST STREET
DULUTH, ST. LOUIS COUNTY, MINNESOTA



FIGURE 2

SITE PLAN LAYOUT

**118 EAST 1ST STREET
DULUTH, ST. LOUIS COUNTY,
MINNESOTA**

- Site Boundary
- Parcel Boundary

All data shown in this exhibit is approximate for display purposes only and does not reflect actual survey data.

Data Sources:
Esri Community Maps Contributors, © OpenStreetMap, Microsoft, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA



PHOTOGRAPHIC LOG

Photographic Log
118 East 1st Street
Duluth, MN 55802
MSA Project No. 0021830000



View from the alley of the fire damaged structure located at 118 East 1st Street.



View of the caved in roof of the 118 East 1st Street building which resulted from fire damage to the building sustained around Thanksgiving 2020.



Elevated parking structure located adjacent and northwest of the 118 East 1st Street building.



View of caved in debris from the roof and second floor of the 118 East 1st Street building.



Complete roof collapse and partial collapse of the second-floor structure of the 118 East 1st Street building.



Caved in debris from the second floor of the 118 East 1st Street building.



Storefront view of the fire damaged 118 East 1st Street building.



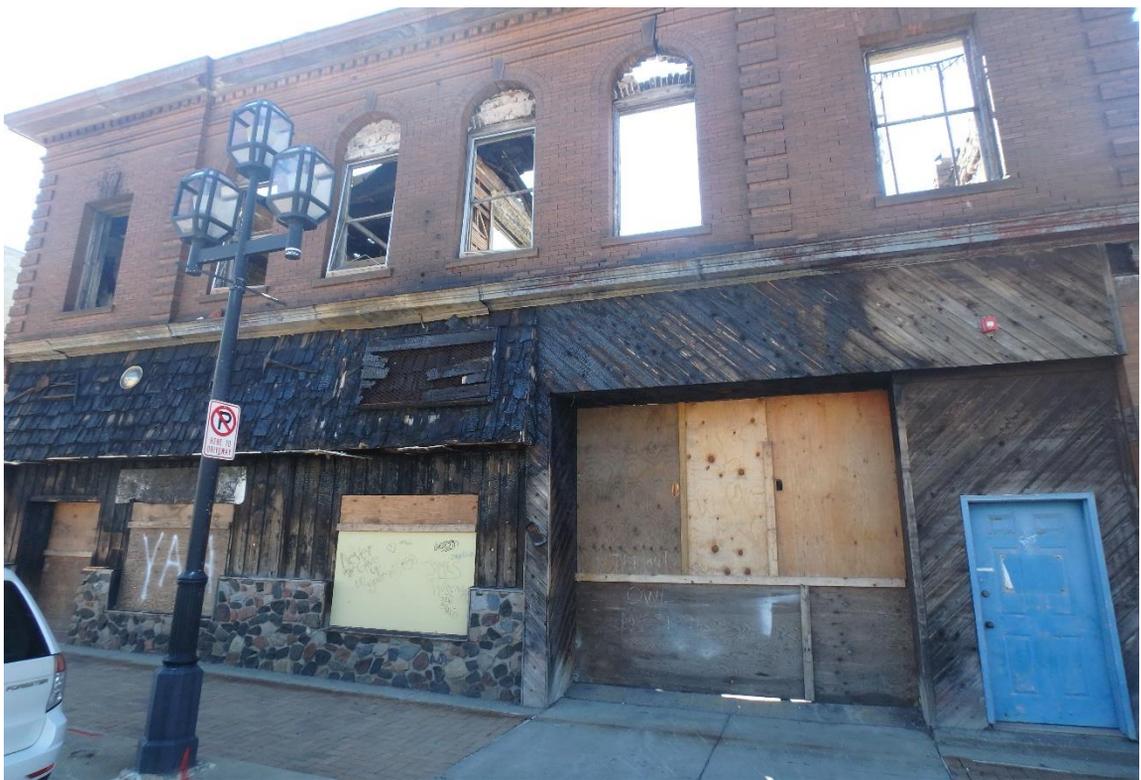
Sidewalk and pavers fronting the 118 East 1st Street building.



Remaining interior wall feature (southwest side) of the 118 East 1st Street building showing fire and structural damage. Note roof absence and second floor separation.



View from the inside of the 118 East 1st Street building looking towards 1st Street. Note roof absence and second floor separation.



View of the 1st Street frontage of the 118 East 1st Street building.



Northeast side of the 118 East 1st Street building as viewed from adjacent parking lot.

May 18, 2022



Heritage Preservation Commission
Duluth, Minnesota

Dear HPC Members;

Veit & Company, Inc. has submitted a request for demolition of the building located at 102-108 East Superior Street as the request of its owners and ZMC Hotels, the manager of the building. This building is listed as a contributing structure as part of a proposed historic district in Duluth. While this building may have some small details that represent the overall architecture of the city, it has been altered and deteriorated to a point where it is no longer recognizable as a good representation of the city's architecture.

Members of this Commission may be familiar with the exterior of the building and some parts of the interior if you patronized any of the businesses. ZMC Hotels would like to invite the Commission to a tour of all areas of the interior and exterior showing our causes for concern. Hard hats and flashlights would be required as well as acknowledgement that the owners and ZMC Hotels are not liable for any injury. There are many hazards inside and the building does not meet standard building codes in general or for ADA accessibility.

This building was originally constructed as the Hotel Astoria in 1906. It is noted in articles that by 1908 the hotel was popular between unmarried couples. Gambling, selling liquor without a license, fights and even a murder-suicide also plagued the hotel. The troubles continued until the hotel closed in 1929 due to a fire that destroyed the building's roof and the parapet stonework above the roofline. Much of the third floor has been unusable since then. The heavily scorched brick and timbers below the roof and on the 3rd floor were left and are still visible today.

Many businesses have taken up residence in the building at various times in its history and it has experienced plenty of vacancies as well. It has been home to grocers, mechanics, restaurants, cleaners, plumbers, screen printing, and more over the years. Most recently the building was occupied by the Chinese Dragon Restaurant (108), Hucklebeary Stationary Store (106), and Old Towne Antiques (102).

Over the years, as businesses have taken up residence, changes were made to the interior. Very little if anything from its days as the Hotel Astoria still exists. Many windows have been removed and/or boarded up due to damage, decay or just not being where the current tenant of the building needed them at that time. The store fronts on Superior Street have been altered

over the years. The store front on Michigan Street has also changed significantly with the installation of four garage doors. Currently, all three Superior Street store front doors have been broken as well as a second story window on the Michigan Street side.



In 2017, the building was purchased by North Creek Investors II, LLC and ZAC NC Asset Investors, LLC and leased to Zenith Asset Company, LLC, an affiliate of ZMC Hotels, LLC. It became known internally as the Bullseye Building as that was the name of the business operated by the sellers at the time of acquisition.

The building has been plagued by issues that come with an aged structure. Decades of little or no maintenance or improvements have left the building in a state of decay that is beyond recoverable and not economically viable, particularly in today's climate of costs and labor.

The exterior of the building is cracked and falling to the ground. The brick on the east side of the building used to be protected by the building next to it. That building was removed in 2005 which then exposed the non-glazed brick to the elements of northern Minnesota. Years of rain, snow, and ice have cause bits of the brick to break off. In some places the damage appears significant. The arched masonry above the windows is poised to come down as soon as any one of the bricks breaks loose. You can see cases where it is the force of the bricks against each other holding it up and nothing else. Many of the windowsills are breaking apart as well.

The roof leaks and has been repeatedly patched. It is now beyond patchwork repair. With the spring 2022 thaw, multiple leaks provided a good stream of water that was enough to reach the second story. The roof needs to be replaced. A quote was obtained in early 2020. Then the pandemic hit, and no further action was taken. This quote has been updated in 2022 but does not include replacing the roof decking. It is likely that it would need to be replaced once the roof is off due to being exposed to moisture repeatedly over the years. Since the decking lies on top of the burnt timbers left from the 1929 fire, it is also likely that these would be required to be replaced to support a new roof and decking.

The interior of the building is exposed brick and drywall. In the basement the brick and stone walls are crumbling, and, in some cases, they have simply fallen away. On the third floor there is an interior brick wall and then the exterior brick wall. In one part, the interior wall has bowed in by several inches. As mentioned previously, much of the brick on the third floor is charred from the 1929 fire.

North Shore Architectural was invited to tour and determine if there was any architectural salvage to be obtained from the building prior to demolition. They found none that was beneficial to them.

There is no real heat or air conditioning in the building. At one point there was a rooftop unit but it long ago stopped working. The Chinese Dragon owners had a window unit for air conditioning and a small furnace to heat the space. The basement and second story of the other tenants were heated with mounted Hot Dawg units. Air conditioning was provided by window units. There is no heat or air conditioning on the third floor. The building has no insulation.

As with any older structure, plumbing leaks occur. In this building, particularly beneath the restaurant, multiple leaks from the bathrooms and kitchen have been repaired. Parts of the

floor beneath the restaurant have fallen into the basement level in areas due to water and grease leaking through it over decades.

In 2021, multiple sewer pipes beneath the concrete basement were found to be collapsed. Repairs included above ground rerouting and cutting up parts of the concrete floor to replace below ground pipes. The decay was so bad that the pipe was falling apart as plumbers were trying to find good pipe to connect replacement PVC. Cameras show collapsed pipes beyond accessibility. The entire concrete floor would need to be removed to replace the sewer pipes completely. Repair of all remaining sewer pipes was not completed due to determining that the building should be demolished.

The building has two water mains coming in from Superior Street. One main was permanently shut down by the city at owner's request in 2021 due to leaking which was flowing into the basement. To repair this would have required tearing up the newly laid Superior Street and sidewalk at significant cost. Tenant water was rerouted from the other water main which also shows significant signs of decay and leaking, but less than the main that was shut down.

The building has long been a harborage for rodents as there are many holes and crevices leading into the structure. Pest control routinely removed from the site. The deterioration of the building has created many access points which have been filled in as they are found. As rodents will do, they find new ones.

Due to the condition of the building, it has never been able to garner proper downtown Duluth rents. It has a net operating loss year over year.

Contrary to what you have heard or seen in the media, there is no current plan to put in a parking lot or ramp. At no time were the owners or ZMC Hotels contacted for comment on any news report. The space will be leveled, covered in class 5 gravel, and will have barriers to prevent parking on the site post-demolition. At this time, there is no plan on paper as to what may be built on the site in the future.

Currently, we are trying to manage illegal entry into the building. Multiple attempts have been made in the short time it has been vacated and there has been one successful entry. All three store front doors on Superior Street have been smashed. Once all work inside the building has been completed, if a permit to demolish is not available, we will have to board up the doors and possibly windows to prevent any trespassing and potential liability of people entering the building. The last thing we want is someone to illegally enter and get hurt or start a fire which could lead to injury to responding personnel as there are staircases to nowhere, many nooks to get lost in, and too many other hazards.

Having this dilapidated eyesore in downtown Duluth is not beneficial to the people who live and visit here, particularly given its proximity to the Lakewalk access on the corner of Superior Street and 1st Avenue East. Based on the extensive decay and damage to this building, we respectfully request that HPC allow this building to be removed.

Please reach out to me to get a tour scheduled for HPC members. My contact information is below.

Your time reading this is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Anne Stratioti".

Anne Stratioti
Operations Administrator
11 E Superior Street, Ste 170
Duluth, MN 55802
218-529-7711 direct
astratioti@zmchotels.com

Structural Engineering Report

Date: April 11, 2022

Project: 102 E Superior Street – Bullseye Bldg- Condition Review

Recipient: Anne Stratioti- ZMC Hotels – 11 E Superior Street, Suite 170, Duluth, MN

Email: Astratoti@ZMChotels.com

NCE Job : 22-202

Regarding: **Structural and Envelope Condition Review**

This report is based on our observations, our calculations and our discussion on site with you.

We visited the site on 4-08-2022 and toured the entire facility with you. We have since performed a few preliminary calculations to determine the existing floor and roof capacities as those values are potentially relevant to the re-use of the existing building.

Observations: (refer to photo pages)

1. The structure is a wood framed (2) level plus basement building with masonry exterior walls. The superior street / Michigan street sides are approximately 100' in length and the Avenue / adjacent parking lot sides are approximately 114' in length.
2. The exterior walls are solid brick, uninsulated, supported on a stone foundation wall system. All exterior walls are in poor to very poor condition. All the exterior walls need to be cleaned and tuckpointed to prevent further deterioration. In several locations the brick is loose, brick lintels have failed, stone windowsills are failed and need to be replaced.
3. The Superior Street level and second level framing generally consists of 2x13 wood joists spaced at 16" on center. The framing is supported either by masonry walls or by steel beams and columns. The typical span of the joists is approximately 20'. Interior floors are slightly permanently deflected, especially at the superior street level in some locations.
4. The roof framing generally consists of 2x12 wood ceiling framing and 2x6 roof framing built-up from the ceiling to form a roof slope. The south-east corner of the building has experienced a significant fire which damaged a large portion of the roof framing and a small portion of the floor framing in that corner.
5. The roofing is old, leaking in many locations, it is not insulated and requires replacement.
6. The existing interior stairway system is not compliant with current codes for rise / run measurements.
7. The existing elevator is freight use only and likely not in accordance with current code for people.
8. The second level, superior street side brick wall is bowed inward at one location and should be repaired.
9. The existing sidewalk vault support system at the east end of the building is deteriorated and requires structural repairs.

Professional Opinions:

1. The exterior brick is in such poor condition, especially at the window openings, that significant brick repair, new lintels and window replacement will be required if the building is to be renovated. The exterior is also not insulated.



2. The roofing system requires replacement and would need insulation to be added if the building were to be renovated. However, to add insulation, the roof would likely need to be reinforced to meet the MN Conservation Code for existing buildings.
3. The floor capacity is acceptable for residential, or office uses on both levels, however the Superior Street level would require reinforcing if retail or restaurant uses were desired per current MN Conservation code.
4. A new elevator and internal stairs would be needed if the building were to be renovated.

Summary:

In our professional opinion, given the needed structural repairs, the needed envelope repairs, the needed vertical transportation renovations described above etc., it is likely more economical to replace the existing building than to renovate and re-purpose this structure.

Respectfully,

Jon E. Aamodt PE
Principal Partner

Professional Certification:

I hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the State of Minnesota.

A handwritten signature in black ink that reads "Jon E. Aamodt".

Jon E. Aamodt, P.E.
MN Reg. No. 24838

Date 04/11/2022



Photo 1: Existing West elevation looking east



Photo 2: Existing West Elevation looking east



Photo 3: North exterior wall looking south



Photo 4: North exterior wall looking south



Photo 5: East exterior wall looking west



Photo 6: East Exterior wall looking west



Photo 7: Existing East exterior wall looking west – close-up view of brick conditions



Photo 8: Close-up view of brick condition on west exterior wall looking east



Photo 9: Close-up view of masonry condition at south elevation looking north



Photo 10: Close-up view of masonry condition at southeast corner of the exterior.



Photo 11: Close-up view of existing east exterior wall masonry condition.



Photo 12: Close-up view of existing east exterior wall masonry condition



Photo 13: Rear (south side) is not ADA accessible.

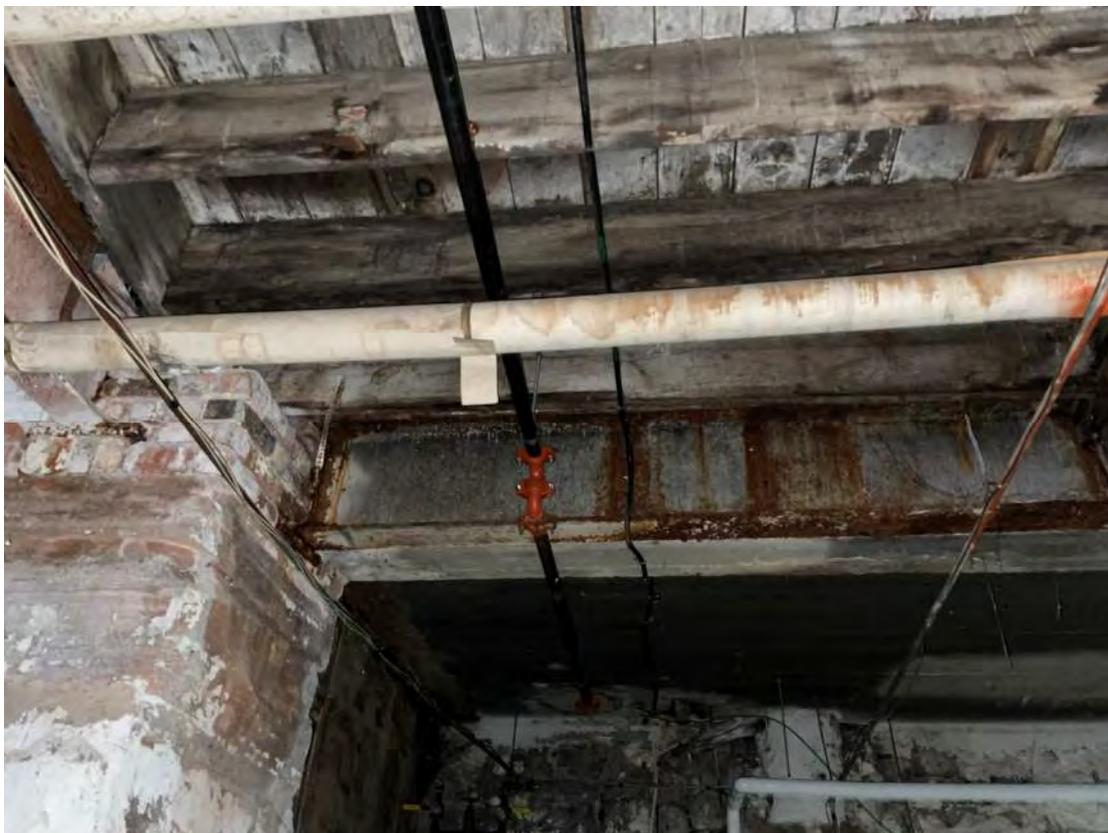


Photo 14: Existing sidewalk vault support and existing wood floor framing near entrances is generally in poor condition



Photo 15: Existing sidewalk vault support is generally in poor condition

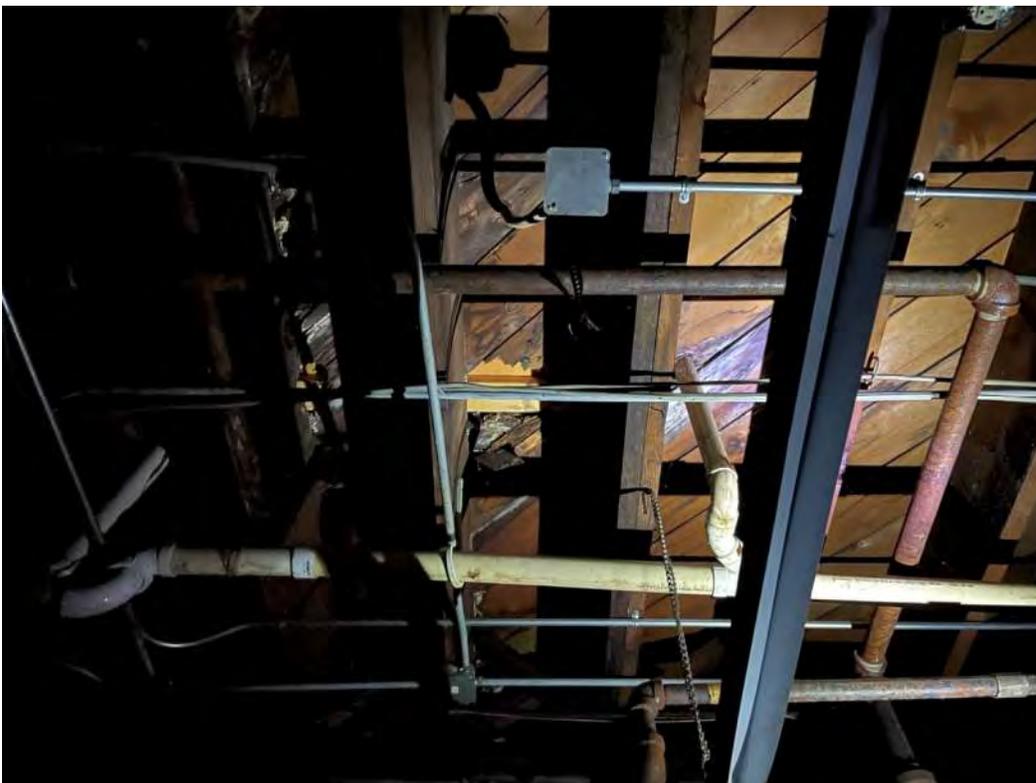


Photo 16: Existing floor framing is damaged by long term plumbing and envelope leaks at several locations inside the building.



Photo 17: Based on our discussions, the sewer connection to the street is in need of excavation and replacement



Photo 18: Rainwater on the upper floor level due to deteriorated roofing.



Photo 19: Interior stairs are not to current code rise / run or fire separation issues and would need to be replaced if major renovation were undertaken



Photo 20: Existing ceiling joist and roof joist system does not meet current code for snow load, is currently not insulated.



Photo 21: Existing roof joists that have been severely damaged due to fire.

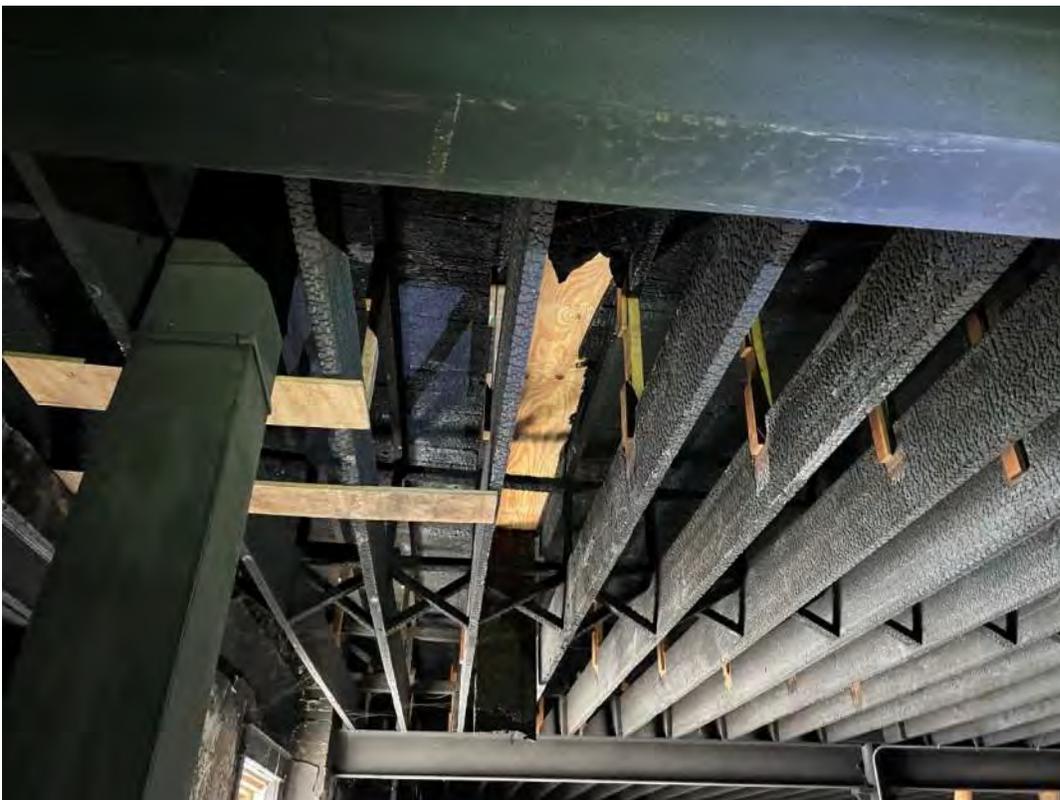


Photo 22: Existing roof joist framing severely damaged due to fire.



Photo 23: Existing wet flooring on the upper level due to roof leaks.



Photo 24: Existing north wall is bowed inward due to poor construction methods and water infiltration.

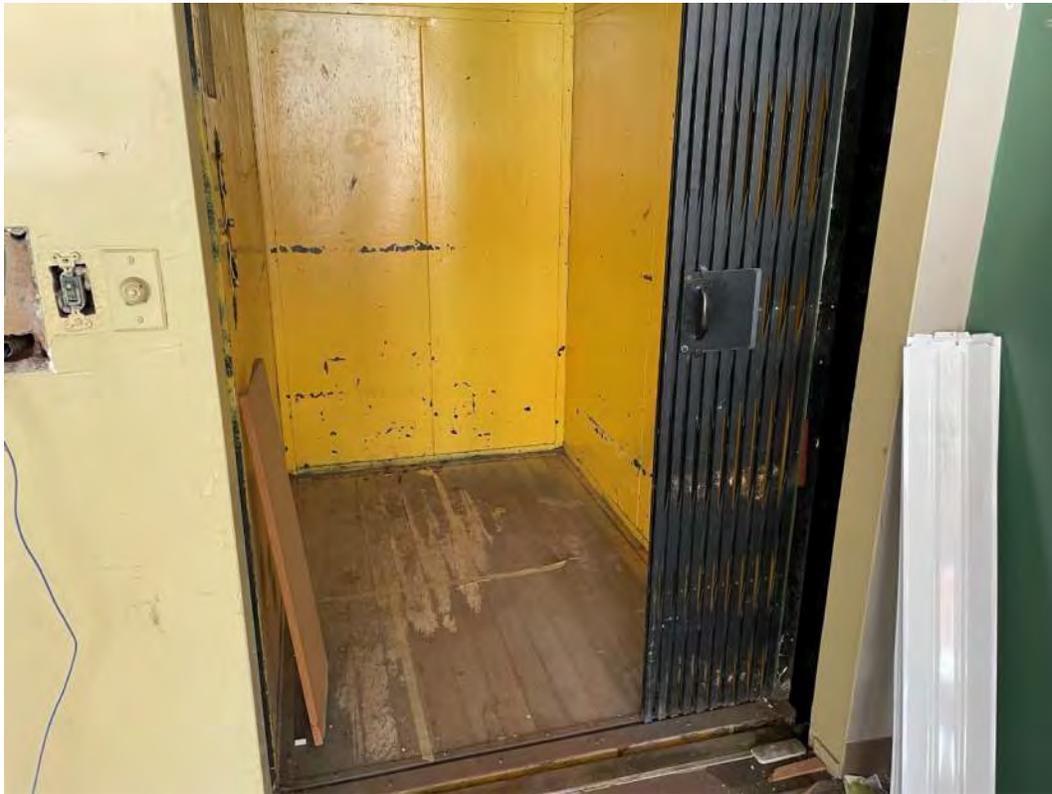


Photo 25: Existing freight elevator, would require significant upgrades or replacement if a significant renovation were to occur.



Photo 26: Existing interior finishes are old and need updating.



Photo 27: Existing interior finishes are old and require updating.

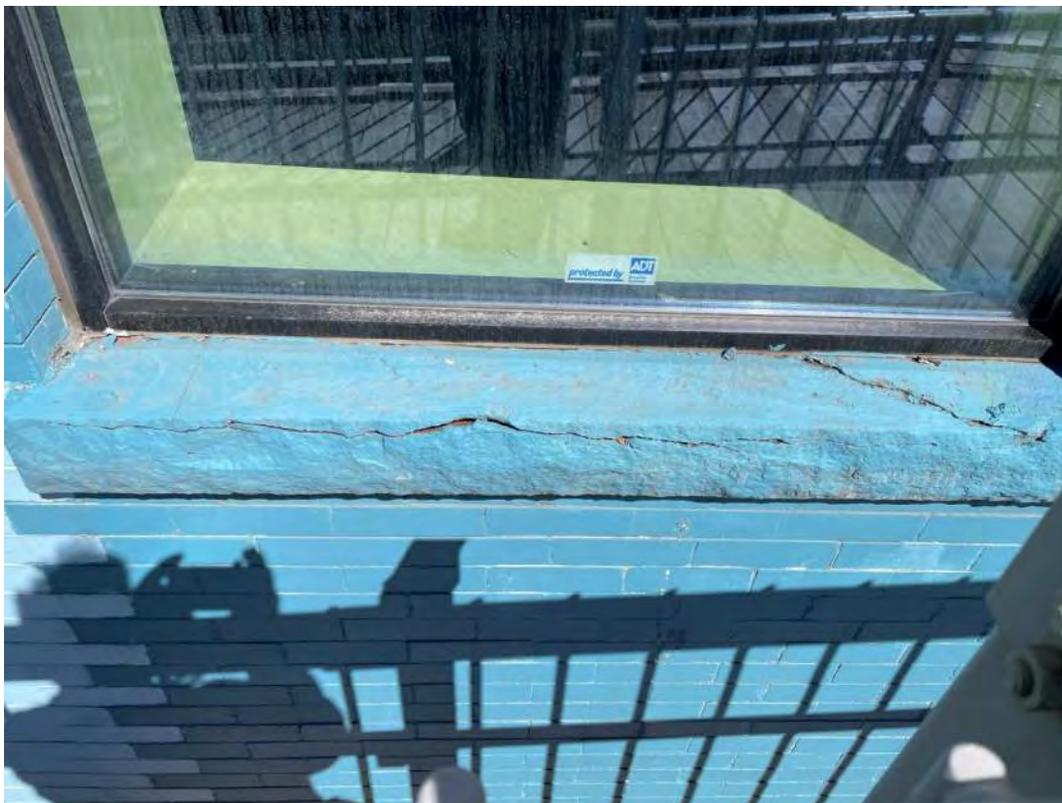


Photo 28: Existing exterior window sill – typical at the perimeter, many are broken and require replacement.



Photo 29: Typical exterior lintels are loose and failing and require replacement

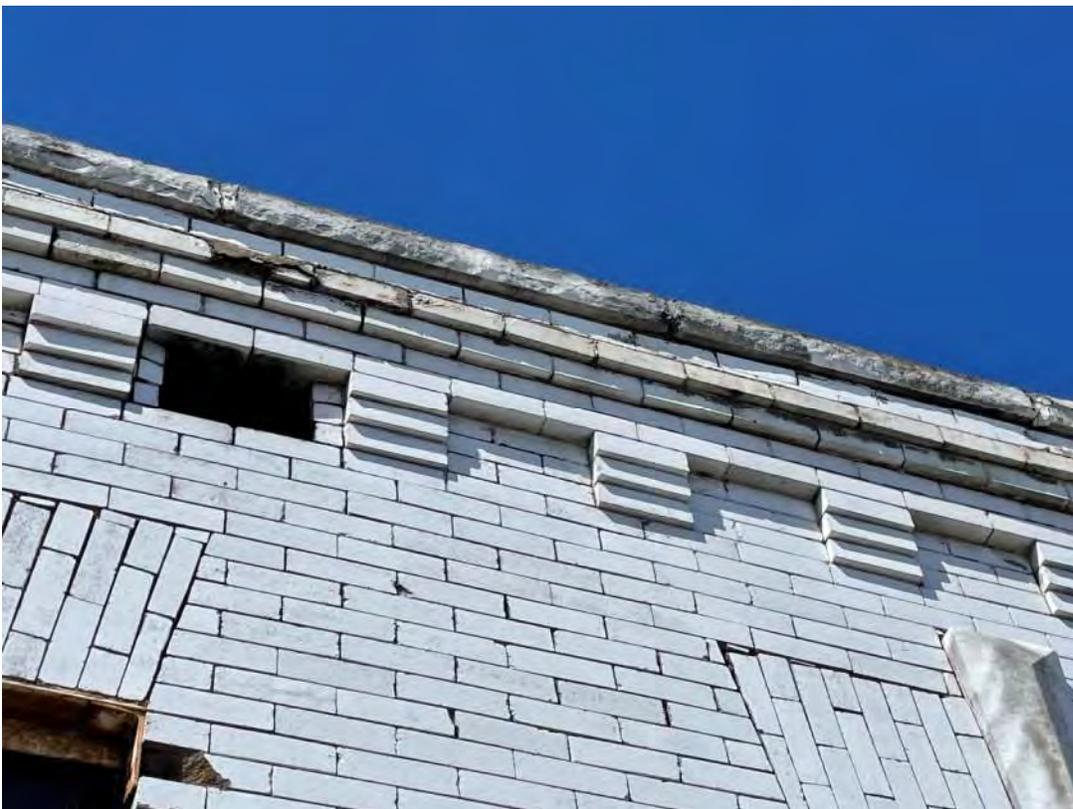


Photo 30: The existing parapets are deteriorated, missing or loose brick and exterior needs tuckpointing to prevent further deterioration.



Photo 31: Exterior southeast corner – note the spalling brick due to moisture intrusion, freeze thaw cycles causes a spall, which falls to the ground.

May 18, 2022

VIA EMAIL ONLY

Duane Castaldi
Regional Environmental Officer
FEMA, Region V
U.S. Dept. of Homeland Security
536 South Clark Street, Floor 6
Chicago, IL 60605

RE: BRIC 4513.4
Duluth Water Treatment Plant Power Backup
8130 Congdon Boulevard
Duluth, Saint Louis County
SHPO Number: 2022-0629

Dear Mr. Castaldi,

Thank you for initiating consultation regarding the above-referenced undertaking. Information received in our office on April 13, 2022 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), its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800), and per the Section 106 Programmatic Agreement (PA) executed in 2014 among the Federal Emergency Management Agency (FEMA), our office, and the Minnesota Division of Homeland Security.

We have completed a review of your letter dated April 13, 2022, a submission which included documentation in support of your agency's No Adverse Effect finding for the above-referenced project.

Our comments and recommendations are provided below.

Define Federal Undertaking and Area of Potential Effect

We understand that the proposed federal undertaking involves funding from your agency to improve operation and resiliency of the Lakewood Water Treatment Plant. The existing water treatment facility and proposed federal undertaking are clearly described in narrative included in your April 13th submission. It is important to note that, although the Site Overview drawing (1 sheet, dated 03/28/2022) provides documentation of the existing site conditions and proposed modifications in plan view, we have not been provided sufficient documentation regarding the design (style, size, massing, materials) of the proposed above-ground infrastructure, including the new powerhouse, generators, and other infrastructure.

We agree that your agency's definition of an Area of Potential Effect (APE), as described in narrative and documented on Figure 3 of your April 13th submission, is appropriate to our understanding of the nature and magnitude of the federal undertaking and takes into account its potential direct and indirect effects.

Historic Property Identification Efforts

Archaeology

We agree with the agency conclusion that there are no recorded archaeological sites in the APE, that the likelihood of intact archaeological sites is low, and, therefore, that an archaeological field survey is not warranted for the undertaking as it is currently proposed.

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

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

Historic/Architectural

Our records confirm your agency's conclusion that the **Lakewood Pump House** [SL-DUL-0455], which in our records also includes the adjacent **Surge Valve Building**, is a historic property within the APE that has been previously evaluated and determined eligible for listing in the National Register of Historic Places (NRHP). We note that this previous SHPO staff evaluation and determination of NRHP-eligibility was in September 1984 and is, therefore, considered incomplete by today's property evaluation standards and outdated per our current state survey guidelines. We appreciate the additional historical information regarding provided in your April 13th submission which essentially supports the fact that the Lakewood Pump House and Surge Valve Building retain sufficient integrity to support NRHP-eligibility.

We also appreciate the information provided regarding the Water Treatment Building and Backwash Building which are located across Congdon Boulevard from the historic Pump House and Surge Valve Building. We understand that the **Water Treatment Building** and **Backwash Building** (SHPO Inventory Numbers Pending) were constructed in 1975, and we appreciate the physical description of this building complex which was provided in your April 13th submission.

Additionally, in our file for the Lakewood Pump House, there is reference to the fact that the construction of the Water Treatment and Backwash buildings in 1975 was a response to the Reserve Mining taconite processing at Silver Bay which included, at that time, discharge of tailings into Lake Superior. We recently completed a review of another federal project in Silver Bay which included extensive historic context development (*Reserve Mining, 1951-1986*) and survey of the Reserve Mining Company Milepost 7 Tailings Basin facility in Silver Bay which was constructed in 1979-1980 following the determination that tailings discharges into the lake were adversely impacting drinking water quality in adjacent communities, including Duluth.

At this time, absent a formal intensive level survey and evaluation meeting the Secretary of the Interior's *Standards for Identification and Evaluation*, it is our opinion that the associated historical significance supports your agency's determination that we consider the Water Treatment Building and Backwash Building as *eligible* for listing in the NRHP for purposes of completing Section 106 review of this federal undertaking only, as it is part of a larger, potential Lakewood Water Treatment Plant Historic District which also includes the Lakewood Pump House, Surge Valve Building and surrounding landscape.

It is our understanding that the Lakewood Pumping Station has been designated as a local landmark by the Duluth Heritage Preservation Commission (HPC). Please provide information regarding your agency's efforts to engage the Duluth HPC in this Section 106 review.

Assessment and Finding of Effect

In order for our office to agree with the agency finding that the proposed undertaking will avoid adverse effects, the proposed modifications within the historic property boundary must be designed appropriately. Typically, this means treatment and design consistent with the Secretary of the Interior's *Standards for Rehabilitation* (Standards). While agree that the proposed switch/metering and generator placement on the north and east of the Water Treatment Building is appropriate per the Standards, we do not have sufficient documentation to support your agency's finding that the proposed new generator and new powerhouse which are proposed to be constructed on either site of the Surge Valve Building have been appropriately designed.

With reference to the Site Overview plan sheet, we note that the proposed location of the pump house and generator have the potential to adversely affect the setting of the Surge Valve Building, specifically its relationship on the landscape, to the boulevard, lakeshore, and Pump House building.

Additionally, the proposed transformer and louvered windbreak behind the Lakewood Pump House have the potential to be highly visible from the primary façade and detract from the main turret of this significant historic building. As your agency is aware, when modifications are necessary for continued use of a historic property or properties within a historic district, the modifications should be designed and located in secondary, or non-character defining, locations within the district, or on non-primary facades of historic buildings.

In addition to the appropriate location of these new structures, the proposed new buildings and structures should be designed in a manner which is compatible in size, massing, materials, and style to the adjacent historic buildings. Your April 13th submission did not provide any design documentation (elevation drawings, materials specifications, manufacturer cut sheets, renderings, photo simulations) for the proposed new building and structures.

Design of these new features should also be somewhat differentiated so as not to present a false sense of history. While compatible design elements may be possible to integrate into the new powerhouse structure, we understand that it may not be possible to “design” the materials and style of the new generators, which makes it even more imperative that these features be placed in inobtrusive locations in order to avoid adverse effects.

Please provide additional design details and justification for placement of proposed new building and structures in the locations identified on current plans and additional explanation regarding how this placement is consistent with the Standards.

Consulting Party and Public Participation

Thank you for providing a summary of tribal consultation that your agency has completed for this undertaking. As stated above, the Lakeside Pump House is a locally designated landmark property by the Duluth HPC. While the HPC may have a separate role in permit review under their local ordinance, the HPC should also be invited to participate in the Section 106 review of this proposed undertaking.

Please provide a summary of public notification of the proposed federal undertaking and its potential effects on historic properties.

If you have any questions regarding our review of this undertaking or would like to arrange for a follow up consultation meeting our office, please contact me at (651) 201-3290 or sarah.beimers@state.mn.us.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

Cc via email:

Stephen Robertson, City of Duluth
Nick Dorochoff, FEMA