



Planning & Development Division
Planning & Economic Development Department

Room 160
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Duluth, Minnesota 55802



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MEMORANDUM

DATE: November 12, 2025

TO: Interested Parties (Including Minnesota Environmental Quality Board Distribution List)

FROM: Jenn Moses, Planning Manager

SUBJECT: Draft Order for the Downtown Duluth Alternative Urban Areawide Review (AUAR)
(PLEAW-2511-0002)

The City initiated this AUAR in anticipation that the downtown area could see significant infill and redevelopment within the coming years, including areas that are within the City's shoreland area and would require environmental review and sensitivity. The AUAR is meant to plan for this development in a holistic manner, understanding that there are environmental benefits of development within an already dense urban area, and that environmental impacts are not contained to one site but rather are best studied and mitigated with a broader lens.

The purpose of the AUAR is to help the City adequately plan for this redevelopment and provide a mitigation plan for how the City and future developers will manage the environmental impacts. The City of Duluth is the Responsible Governmental Unit (RGU) and the Proposer for the AUAR.

The City has elected to designate subareas within the broader AUAR area to facilitate the process of studying and planning mitigation for 335 acres of the City's urban core, which is comprised of many different uses and forms of development. The four subareas include:

- **Lot D Subarea:** Located at 500-1000 Railroad Street in the Bayfront District.
- **1st Street Subarea:** Generally, bound by 2nd Street to the north, 3rd Avenue East to the east, Interstate 35 (I-35) to the south, Mesaba Avenue to the west.
- **Essentia Subarea:** Generally, bound by 5th Street to the north, 7th Avenue East to the east, I-35 to the south and 3rd Avenue E to the west.
- **Secondary Subarea:** Generally, bound by 5th Street to the north, 14th Avenue East to the east, London Road to the south and 7th Avenue East to the west.

This document constitutes an order for review. Accompanying is the Scoping Document for the proposed redevelopment. The Scoping Document will be published for review and comment as part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a.

Pursuant to Minnesota Rules, part 4410.3610, subpart 5a(C), the purpose of the comments on a Scoping Document for an AUAR are to suggest additional development scenarios and relevant issues to be analyzed in the review. Comments may suggest alternatives to the proposed development scenarios,

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including development at sites outside of the proposed geographic boundary. The comments must provide reasons why an alternative development scenario is potentially environmentally superior to those identified in the RGU's draft order.

AUAR Area

The AUAR area includes an approximately 335 acre area encompassing the traditional downtown, Essentia Health Medical Campus and surrounding Hillside neighborhood, as well as the proposed "Lot D" development in the Bayfront area in the City of Duluth, St. Louis County, Minnesota (see Figure 1).

Development Scenarios

Two development scenarios will be considered as part of the AUAR which include one scenario that encompasses the existing conditions as a comparison to the maximum development scenario which is consistent with the growth planned for in the City's adopted Comprehensive Plan (Imagine Duluth 2035 – Forward Together). The maximum development scenario plans generally for mixed use redevelopment of key sites within the broader downtown area.

Table 1: AUAR Development Scenarios

Description	Scenario A - Existing Conditions	Scenario B – Maximum Development
Total Project Acreage	Total approx. 335	Total: approx. 335
Linear Project length	Not applicable (N/A)	N/A
Residential building area (in square feet)	1,948,000	4,069,000
Commercial building area (in square feet)	5,983,000	6,053,000
Industrial building area (in square feet)	67,000	67,000
Institutional building area (in square feet)	4,141,000	4,416,000
Other uses – Tourism (in square feet)	540,000	869,000
Total Project Square Footage	12,679,000	15,474,000
Lot D Subarea		
Subarea Acreage	Approx. 19	Approx. 19
Residential building area (in square feet)	0	802,000
Commercial building area (in square feet)	0	0
Industrial building area (in square feet)	0	0
Institutional building area (in square feet)	0	0
Other uses – Tourism (in square feet)	0	93,000
Total Project Square Footage	0	895,000
Structure height (feet)	0	Up to 120 ft.
Essentia Subarea		
Residential building area (in square feet)	510,000	1,460,000
Commercial building area (in square feet)	1,191,000	1,241,000
Industrial building area (in square feet)	14,000	14,000
Institutional building area (in square feet)	2,456,000	2,731,000
Other uses – Tourism (in square feet)	174,000	410,000
Total Project Square Footage	4,345,000	5,856,000
Structure height (feet)	Up to 18 stories (St. Mary's Medical Center)	Up to 200 ft.
1st Street Subarea		
Residential building area (in square feet)	808,000	1,300,000
Commercial building area (in square feet)	3,985,000	4,005,000
Industrial building area (in square feet)	30,000	30,000
Institutional building area (in square feet)	48,000	48,000
Other uses – Tourism (in square feet)	312,000	312,000
Total Project Square Footage	5,183,000	5,446,000
Structure height (feet)	Up to 15 stories (Alworth Building)	Up to 200 ft.
Secondary Subarea		
Residential building area (in square feet)	630,000	756,000
Commercial building area (in square feet)	807,000	807,000

Description	Scenario A - Existing Conditions	Scenario B – Maximum Development
Industrial building area (in square feet)	23,000	23,000
Institutional building area (in square feet)	1,637,000	1,637,000
Other uses – Tourism (in square feet)	54,000	54,000
Total Project Square Footage	3,151,000	3,277,000
Structure height (feet)	Up to 114 ft. (St. Luke's Hospital)	Up to 200 ft.

Public Comment Period

The public is invited to comment on the proposed development scenarios and relevant issues to be evaluated in the AUAR prior to issuance of a final AUAR order. The 30-day comment period will begin on November 25, 2025. Comments will be accepted through 4:00 PM on December 26, 2025. and should be addressed to:

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 City Hall, Room 160
 411 West First Street
 Duluth, MN, 55802
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jmoses@duluthmn.gov

The Planning Commission will hold a public hearing on Tuesday, December 9, 2025, 5 p.m., in the Council Chambers of Duluth City Hall.

Staff Recommendation

Staff recommend that Planning Commission approves distribution of the Downtown Duluth Scoping EAW and Draft Order for Review.

Figure 1: AUAR Area



Figure 2: Development Scenario A – Existing Conditions

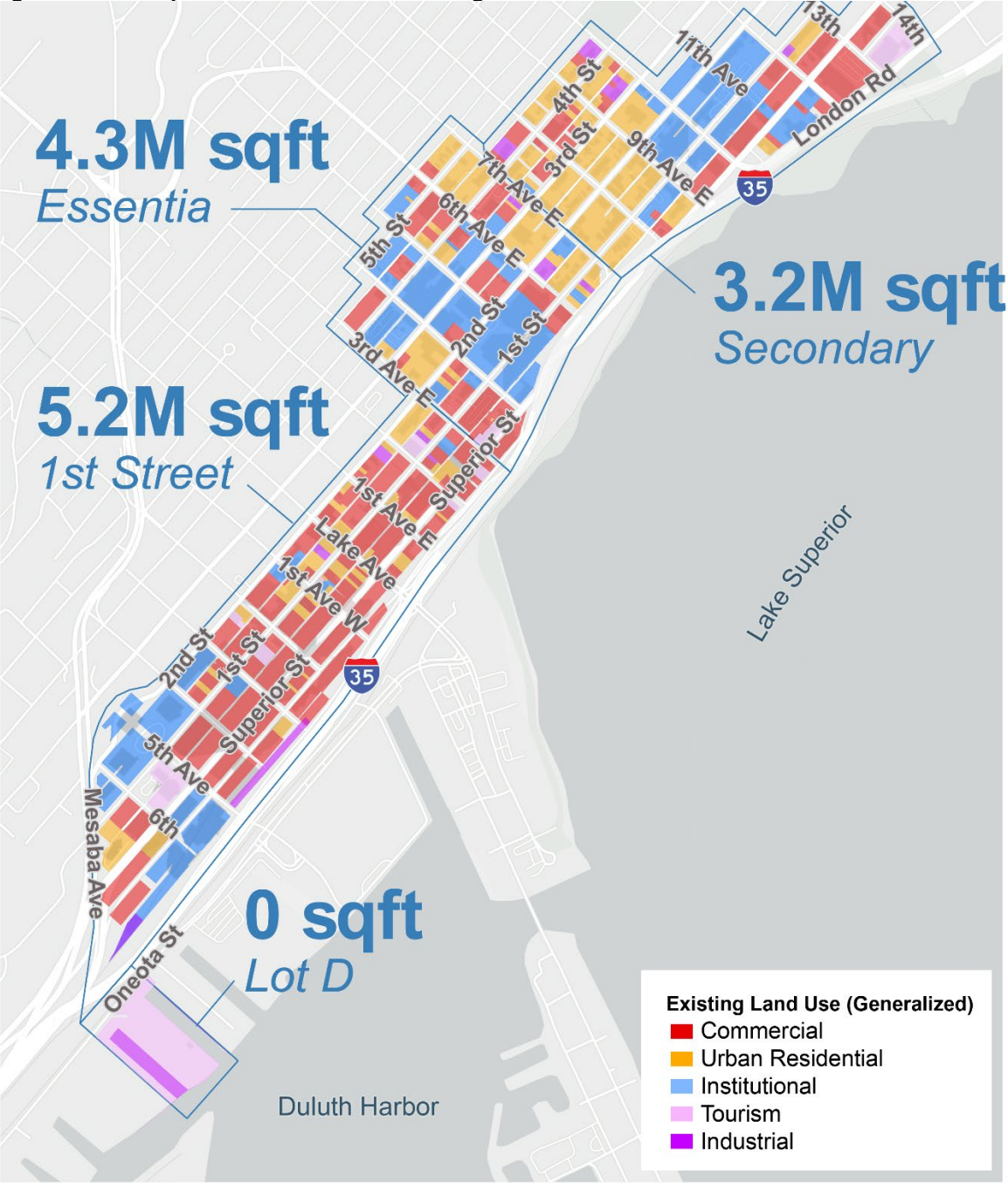


Figure 3: Development Scenario B – Maximum Development

