Steven Robertson

From: Koop, Michael (ADM) <michael.koop@state.mn.us>
Sent: Friday, July 8, 2022 4:05 PM
To: Steven Robertson <srobertson@DuluthMN.gov>; Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>
Subject: RE: Status of Duluth Building, former Astoria Hotel

Hi Steven,

Thank you for sending the demolition zoning application and related materials regarding 102-108 East Superior Street for our review and comment. We appreciate being apprised of such situations, but it is worth repeating that the State Historic Preservation Office has no regulatory role in the proposed demolition of a National Register-listed property by a private owner, so we must be mindful not to overstep our authority.

In general, the document we received is insufficient to provide an informed response. While we do not dispute the observations in the April 11, 2022 Northland Consulting Engineers memo regarding the overall condition of 102-108 East Superior Street, SHPO staff found the information to be cursory, non-technical, and lacking sufficient details to determine if the building could feasibly be repaired or not. The memo appears to be largely based on predetermined value judgments and a limited familiarity with historic buildings. For instance, although the author suggests that it is likely more economical to replace the existing building than to renovate, it is not typically the engineer's role to decide if rehabilitation is "worth it" or what the value of the building is. The consulting engineer's job is to determine what repairs are required and how much those may cost. After those expected costs are determined, it is up to the owner and other professionals to decide if the costs are neither feasible nor valuable.

Our office has seen dozens of buildings with issues similar to 102-108 East Superior – buildings that have been vacant for many years and suffered damage from water infiltration – be successfully rehabilitated despite what appear to be serious structural problems. We would be happy to provide technical assistance to the owners if it is decided to repair and repurpose the building. As you know, rehabilitation could include taking advantage of federal and possibly state historic tax credits. However, if demolition is permitted by the City, we can work with you to determine appropriate mitigation measures such as archival documentation and appropriate design review of whatever is built in its place.

You had also referenced 118 E. 1st Street, which was badly damaged by multiple fires over the last several years. Without specific details regarding the physical condition of the building, it is impossible to comment on how easily it could be repaired and reused. However, it appears as if all four walls of 118 E. 1st Street are intact, so it seems possible that the building could be saved. Our office has worked with municipalities and owners of historic buildings that were badly damaged by fire – one recent example is a large corner building in a downtown Winona historic district that was successfully rehabilitated after a severe fire destroyed the roof and upper floor. But in regards to a demolition zoning application, similar to 102-108 East Superior Street, SHPO has no official role in the proposed demolition of a National Register-listed property by a private owner.

Regards,

Mike

From: Steven Robertson <srobertson@DuluthMN.gov>
Sent: Wednesday, July 6, 2022 6:37 AM
To: Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>
Cc: Koop, Michael (ADM) <michael.koop@state.mn.us>
Subject: RE: Status of Duluth Building, former Astoria Hotel

Sarah,

Good morning! I wanted to let you know that the HPC meeting is next Monday at noon. The HPC folks had asked me to reach out and see if there were any comments or suggestions or thoughts on the 102 E Superior St project, or with the newer 118 East First Street project. Thank you.

Steven Robertson | Interim Manager | **City of Duluth** | 411 West First Street, Room 160, Duluth, MN 55802 | 218-730-5295 | srobertson@duluthmn.gov