



**Planning & Development Division**  
*Planning & Economic Development Department*

Room 160  
411 West First Street  
Duluth, Minnesota 55802



218-730-5580



planning@duluthmn.gov

Date: September 9, 2021  
To: President Fortney and Planning Commissioners  
From: Steven Robertson, Senior Planner  
RE: HPC Review of Potential Adverse Impact to Historic Properties

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The HPC has been asked to comment on pending redevelopment project at 862 East Upham Road, known as Windwood Townhomes. Attached with this memo are the following:

- June 21, 2021, Request for Project Review by the State Historic Preservation Office (24 pages in total, not all pages attached)
- August 2021 Phase 1 and 2 Architectural History Survey by New History (214 pages in total, not all pages attached due to document size, but the entire report is available if interested)
- August 12, 2021, SHPO Response Letter

To be more specific, the HPC has been asked to review the proposed project and determine whether or not that the board agrees with MHFA's determination that the Windwood Project would have no adverse effect on any nearby properties.



400 Wabasha Street North, Suite 400  
St. Paul, MN 55102  
P: 800.657.3769  
F: 651.296.8139 | TTY: 651.297.2361  
[www.mnhousing.gov](http://www.mnhousing.gov)

June 21, 2021

Sarah Beimers  
State Historic Preservation Office  
Administration Building 203  
50 Sherburne Avenue  
Saint Paul, MN 55155

Re: Proposed Windwood Townhomes Project  
807 Upham Road  
Duluth, St. Louis County  
SHPO Number: TBD

Dear Ms. Beimers,

The Minnesota Housing Finance Agency (MHFA) on behalf of the Department of Housing and Urban Development (HUD), who has delegated the responsibility of leading the Section 106 review to MHFA, would like to initiate consultation with your office under Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 306108) and its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800), on the planned rehabilitation of the Windwood Townhomes at 807 Upham Road, Duluth, Minnesota 55811.

**Define Federal Undertaking and Determine the Area of Potential Effect**

The Windwood Townhomes were constructed in 1971. The townhomes serve a critical low-income housing need in Duluth. The property requires significant updates, including:

- Siding replacement
- Construction of new porches
- Site work to mitigate water intrusion at the lower level of the townhomes
- Interior cosmetic updates to units
- Removal of a townhome structure to construct a new community building, playground, and ADA accessible units

The proposed Area of Potential Effect for this project will encompass the Windwood Townhomes site as well as the area in the vicinity with unobstructed site lines to the project area. A map showing the proposed APE is attached.

We look forward to consulting with your office through the development of this project. As Duluth is a Certified Local Government, we will also consult with the City of Duluth and the Duluth Heritage Preservation Commission. If historic properties are identified within the APE, we will consult with those property owners. If you have any questions or would like to discuss the project further, I can be reached at the contact information below. You may also contact our historical consultant, New History, at 612-843-4140 or via email at the contact information provided below.

Sincerely,



Aaron Keniski

Multifamily Programs

651-296-4452

[Aaron.Keniski@state.mn.us](mailto:Aaron.Keniski@state.mn.us)

Cc: Nancy Cashman, Center City Housing Corp., [ncashman@centercityhousing.org](mailto:ncashman@centercityhousing.org)  
Jean Eide, Rippley Richard Real Estate Development Services, LLC, [jeide@rippleyrichard.com](mailto:jeide@rippleyrichard.com)  
Tamara Halvorsen, New History, [halvorsen@newhistory.com](mailto:halvorsen@newhistory.com)  
Lauren Anderson, New History, [anderson@newhistory.com](mailto:anderson@newhistory.com)

Enclosure

Please mail the completed form and required material to:

State Historic Preservation Office  
203 Administration Building  
50 Sherburne Ave  
St. Paul, MN 55155



## Request for Project Review by the State Historic Preservation Office (SHPO)

This is a new submittal

This is additional information relating to SHPO Project #: \_\_\_\_\_

DATE: \_\_\_\_\_

### I. GENERAL PROJECT INFORMATION

Project Title: \_\_\_\_\_

Project Address (or Location): \_\_\_\_\_

City / Township (circle one): \_\_\_\_\_ Zip: \_\_\_\_\_ County: \_\_\_\_\_

Legal Description: Township \_\_\_\_\_ Range \_\_\_\_\_ E/W (circle one) Section \_\_\_\_\_ Quarter-section \_\_\_\_\_

### II. PROJECT CONTACT INFORMATION

Project Contact Name: \_\_\_\_\_ Title: \_\_\_\_\_

Company/Agency: \_\_\_\_\_

Street Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ Email: \_\_\_\_\_

### III. FEDERAL AND/OR STATE INVOLVEMENT

Federal Agency (if applicable): \_\_\_\_\_

(Agency providing funds, licenses, or permits)

Permit or Project Reference #: \_\_\_\_\_

State Agency (if applicable): \_\_\_\_\_

(Agency providing funds, licenses, or permits)

Permit or Project Reference #: \_\_\_\_\_

Local Agency (if applicable): \_\_\_\_\_

(Continued on Reverse Side)

Please refer to the [Instructions for Completing the Request for Project Review Form](#). Submit one *Request for Project Review* form for each project. Project submittals will not be accepted via fax or e-mail. For questions regarding the SHPO review process, please [visit our website](#) or contact Kelly Gragg-Johnson, Review and Compliance Specialist, at 651-201-3455 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

## IV. PROJECT DESCRIPTION AND BOUNDARIES

### A) REQUIRED FOR ALL PROJECTS

Write a detailed description of the proposed project. (See attached.)

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Attach a map of project location, with project area(s) clearly marked. Road names must be included and legible.

### B) Architecture

Are there any buildings or structures within the project area?      Yes    No

If **No**, continue to the Archaeology section below. If **Yes**, submit all of the following information:

List all buildings and structures within the project area and the year they were built. (See attached.)

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Photographs of **each** building and structure located within the project area, along with a photo key. Include streetscape images, if applicable. All photographs must be clear, crisp, focused, and taken at ground level. Aerial photos are insufficient.

List known historic buildings or structures located within the project area (i.e., individual properties or districts which are listed in the National Register or which meet the criteria for listing in the National Register). (See attached.)

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### C) Archaeology

Does the proposed undertaking involve ground-disturbing activity?      Yes    No

If **No**, this form is complete. If **Yes**, submit all of the following information:

Attach the relevant portion of a 1:24000-scale USGS topographic map (photocopied or computer generated) **with the project boundary marked**.

Description of current and previous land use and disturbances: (See attached.)

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Any available information concerning known or suspected archaeological resources within the project area. (See attached.)

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# County Land Explorer

St. Louis County, Minnesota



## Windwood Townhomes Proposed APE

Map created using County Land Explorer  
[www.stlouiscountymn.gov/explorer](http://www.stlouiscountymn.gov/explorer)



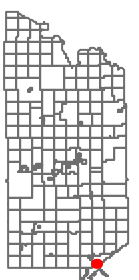
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County Land Explorer  
St. Louis County [www.stlouiscountymn.gov/explorer](http://www.stlouiscountymn.gov/explorer) Minnesota

### Disclaimer

This is a compilation of records as they appear in the Saint Louis County Offices affecting the area shown. This drawing is to be used only for reference purposes and the County is not responsible for any inaccuracies herein

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## Windwood Townhomes - Buildings in Project Area

Name/Address	Year Built
Windwood Townhomes	1971
715 E Central Entrance	1996
639 E Central Entrance	1996
621 E Upham Road	1971
220 Pecan Ave	1995

# WINDWOOD TOWNHOME BUILDING EXTERIOR REVIEW

LHB# 200071

Page 1 of 6



*Figure 1 View of complex from road.*



*Figure 2 Typical roof picture. Note shingle damage, otherwise good conditions*

WINDWOOD TOWNHOME BUILDING EXTERIOR REVIEW

LHB# 200071

Page 2 of 6



*Figure 3 Soffit and trim in good condition as us upper siding of vinyl.*



*Figure 4 Lower fiber cement siding installed down to grade*



*Figure 5 Fiber cement into the soil and at uphill location. Note typical deterioration of siding at this location*



*Figure 6 Oldest window type, one latch. Note pencil for support*



*Figure 7 Fogged thermopanes in newer window series*



*Figure 8 Mix of door ages and conditions. Dented on right, new on left.*

WINDWOOD TOWNHOME BUILDING EXTERIOR REVIEW

LHB# 200071

Page 5 of 6



*Figure 9 Porch system, generally in good condition*



*Figure 10 Stoop condition, solid but some grease stains*

WINDWOOD TOWNHOME BUILDING EXTERIOR REVIEW

LHB# 200071

Page 6 of 6



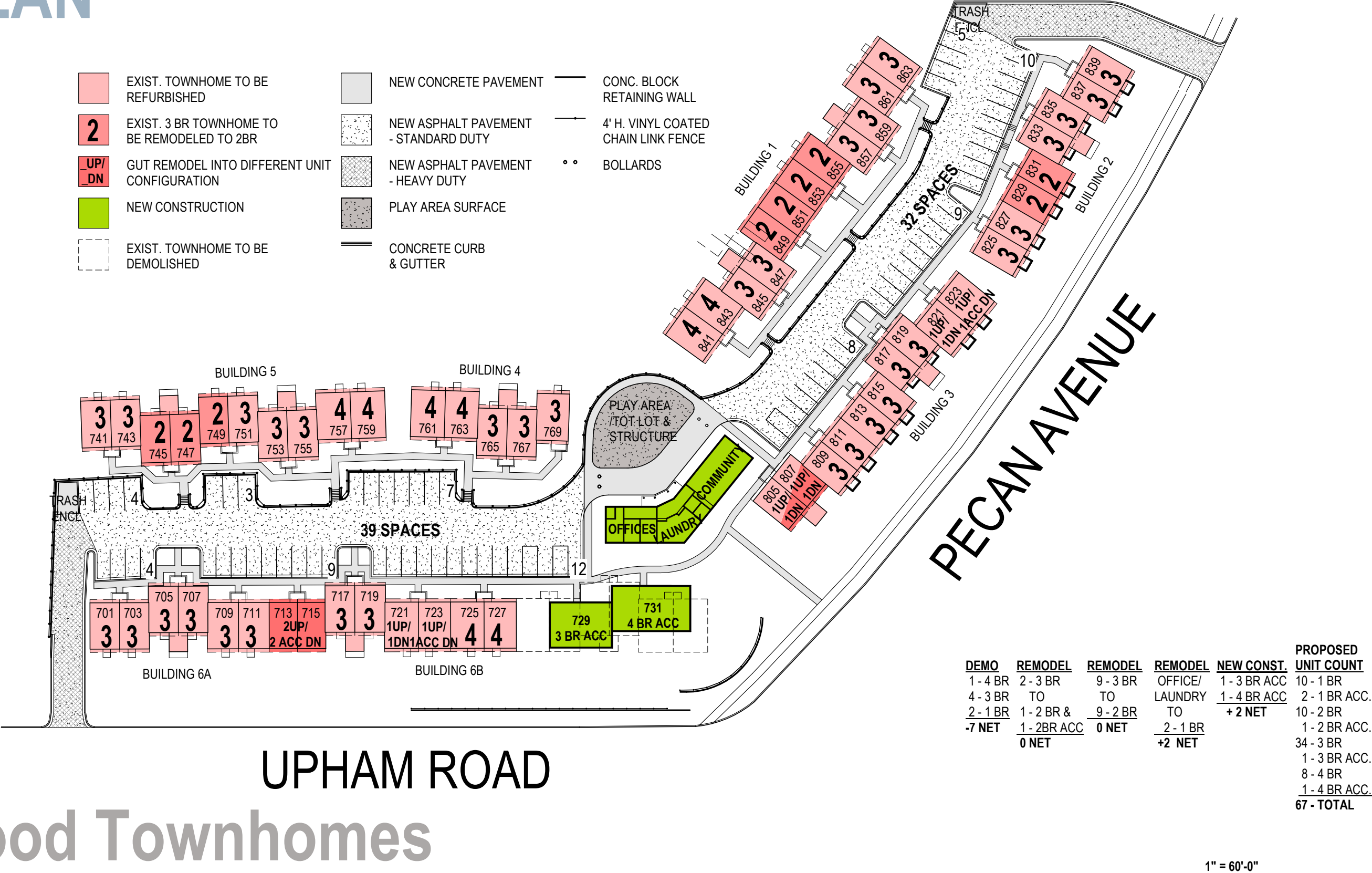
*Figure 11 Overall front typical view*



*Figure 12 Overall typical rear view*

# SITE PLAN

07/01/2020



## Windwood Townhomes

# NEW COMMUNITY ROOM FLOOR PLAN & ELEVATION

07/01/2020



## Windwood Townhomes

1" = 10'-0"

# NEW ACCESSIBLE UNIT FLOOR PLANS & ELEVATION

07/01/2020

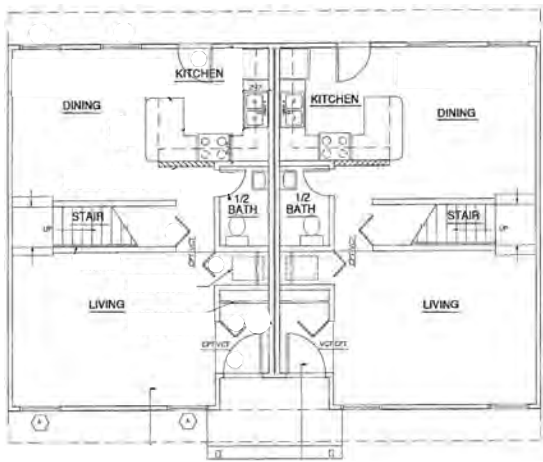


## Windwood Townhomes

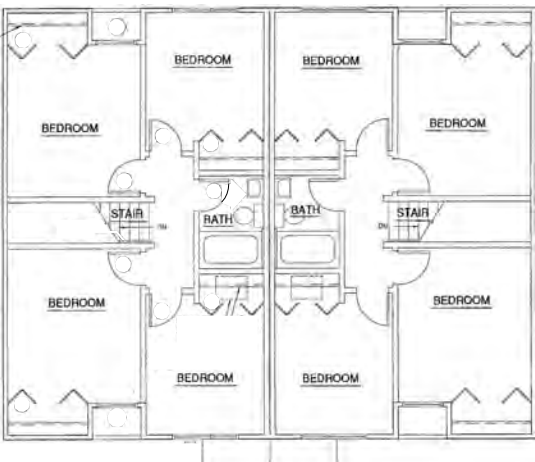
CCHC  
DULUTH, MN

# EXISTING UNIT PLANS

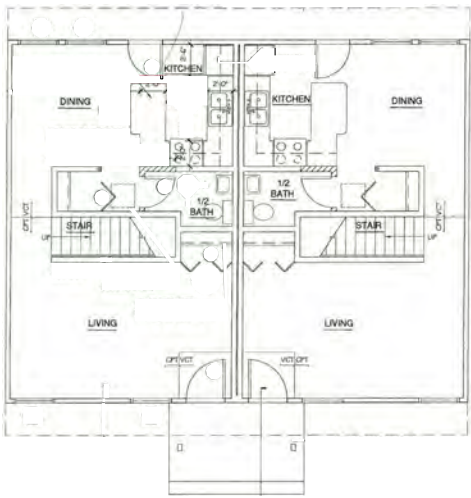
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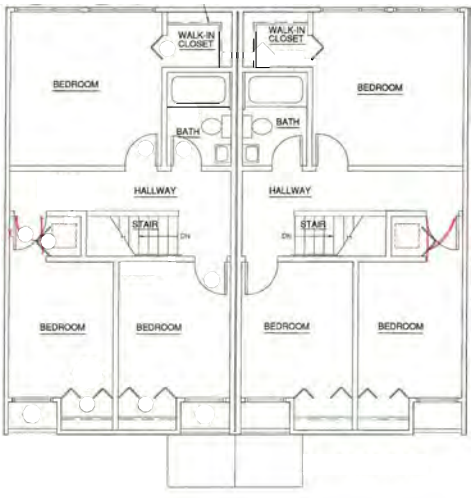
4 BED UNIT - FIRST FLOOR PLAN



4 BED UNIT - SECOND FLOOR PLAN



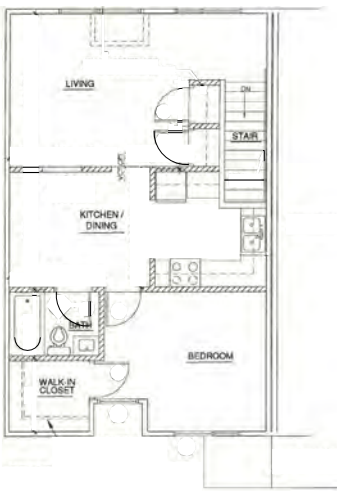
3 BED UNIT - FIRST FLOOR PLAN



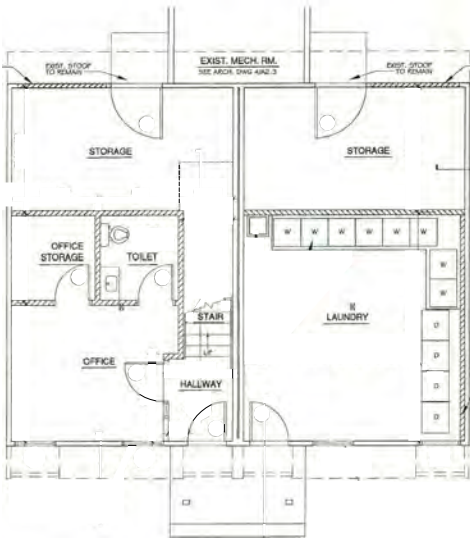
3 BED UNIT - SECOND FLOOR PLAN



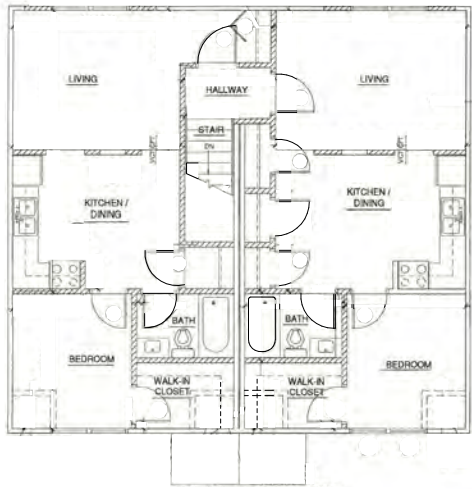
1 BED UNIT - FIRST FLOOR PLAN



1 BED UNIT - SECOND FLOOR PLAN



OFFICE & LAUNDRY



1 BED UNIT - SECOND FLOOR PLAN

# Windwood Townhomes

NOT TO SCALE

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DULUTH, MN



PERFORMANCE  
DRIVEN DESIGN.  
LHBcorp.com

# 3D VIEW - TOWNHOMES

07/01/2020



## Windwood Townhomes

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# EXISTING CONDITIONS - EXTERIOR

07/01/2020



## Windwood Townhomes

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# WINDWOOD TOWNHOMES

## SCOPE OF WORK

July 7, 2020

### SITE

1. Parking lot:
  - a. Mill and overlay asphalt
  - b. Patch holes and correct base
  - c. Install heavy duty pavement section at entry drives up to trash enclosures
  - d. Install additional catch basins to handle surface storm water run-off
  - e. Reconfigure pavement in areas adjacent to new community building and residential units
2. Curb and gutter:
  - a. Demo and replace all
  - b. Reconfigure curb and gutter in areas adjacent to new community building and residential units
3. Sidewalks and other flat work:
  - a. Demo and replace all sidewalks
  - b. Reconfigure and add sidewalks in areas adjacent to new community building and residential units
  - c. Demo sidewalk to Pecan Avenue between Buildings 2 and 3
  - d. Install one new sidewalk to Upham Road
4. Retaining Walls:
  - a. Demo and replace loose-laid block retaining walls entire length of uphill side of parking lots
    - i. Average wall height between 4 and 5 feet
  - b. Demo and reconfigure loose-laid block retaining walls at new play area between buildings 1 and 4
    - i. Average wall height between 5 and 6 feet
  - c. Repair loose-laid block retaining walls along Upham Road and Pecan Avenue
5. Drainage:
  - a. Correct and direct storm drainage on north side of buildings 1, 4 and 5
    - i. Provide erosion resistant or erosion proof swale (concrete walk?) to eliminate erosion and damage to ground cover caused by pedestrian traffic
    - ii. Provide storm catch basins at high side of retaining wall between buildings 1 and 4
  - b. Correct grade and drainage to eliminate ponding on north (parking lot) side of buildings on downhill side of parking lot
  - c. Install stormwater retention and flow control tank under parking lot
  - d. Control drainage between buildings on downhill side of parking lot to prevent erosion and flow against or towards building foundations
  - e. Correct grade around buildings so that grade is below foundation sill

- f. Install drain tile around perimeter of buildings 4, 5, 6 and 6a to relieve hydrostatic pressure against crawlspace foundations. Waterproof foundation walls.
- 6. Landscape:
  - a. Protect and save significant healthy trees
  - b. Replace grass
  - c. Install new perimeter plantings on north (parking lot side) of buildings on downhill side of parking lot
    - i. Landscape materials should be 'low maintenance'
  - d. Replace all fencing with new 4-foot-high vinyl-coated chain link fencing
- 7. Amenities and Other:
  - a. Install new play lot and structure
  - b. Install 2 new trash enclosures
  - c. Install new site lighting
    - i. Salvage and reuse newer sidewalk pole and lights
    - ii. Wall packs at areas between buildings and back side of buildings
  - d. Install new site-wide security camera system that provides 100% site coverage
    - i. Security cameras at drive entrances that are capable of capturing license plate numbers
    - ii. Salvage cameras installed in 2017
  - e. Install monument signs at parking lot entrances and interior site directional signage

#### **EXISTING BUILDING EXTERIORS**

- 1. Demo siding and replace siding with vinyl siding
  - a. Alternate: Use fiber cement siding
- 2. Demo and replace all roofing
  - a. Use architectural 245 lb. shingles with 25 (min.) year warranty
  - b. Alternate: Add dormers on main roof at parking lot side
- 3. Demo and replace windows with Energy Star certified vinyl windows
  - a. Increase vertical dimension of horizontal second floor bedroom windows by lowering sill
- 4. Demo and replace exterior dwelling unit entrance doors with insulated fiberglass doors
- 5. Replace exterior utility doors with insulated metal doors with heavy duty gauge skins

#### **REMODEL AND REHAB**

- 1. Rehab 52 dwelling units by demolishing and replacing components:
  - a. Kitchens
    - i. Cabinets, counter and sinks
    - ii. Energy Star Certified refrigerators – accessible models at accessible units
    - iii. Ranges
    - iv. Range hoods
    - v. Grease shields

- b. Bathrooms
    - i. Replace rotten subfloor in bathrooms
    - ii. New 2-speed exhaust fans with constant low-speed
  - c. New interior wood doors
  - d. New flooring: Resilient on main level and carpeted stairs and second level
  - e. Energy Star lighting
2. Remodel nine (9) 3-bedroom units into nine (9) – 2-bedroom units by converting one bedroom into a den by demolishing closet in one bedroom.
- a. Balance of work per rehab scope
3. Remodel two (2) 3-bedroom units into two (2) 2-bedroom flats
- a. First floor flat to be ANSI 117.1 Type A accessible unit
  - b. Second floor flat to be reached by stair and be ANSI 117.1 Type B unit
  - c. Add sound attenuating construction to floor-ceiling assembly
4. Remodel office and laundry room into two (2) 1-bedroom units
- a. Add sound attenuating construction to floor-ceiling assembly
5. Other Rehab Work:
- a. Provide secure separation of crawl spaces between units (assume 48 separations). Existing crawl spaces run under several units with access panels into each unit. This condition is a security and privacy risk. Crawl spaces shall allow movement of air so that venting is not impeded.
  - b. Provide tamper-proof access panels in floor to crawl spaces (57 locations)
  - c. Provide additional crawl space venting
  - d. Replace existing crawl space vents with vents that automatically close during colder months and open during warmer months
  - e. Provide radon mitigation systems – 1 per footing/foundation area (assume 13)
  - f. Level crawl space floors and repair or replace vapor barrier with heavy duty 15 mil reinforced plastic sheet
  - g. Provide secure separation of attic spaces between units
  - h. Insulate soffits at 2<sup>nd</sup> floor overhang
  - i. Insulate roof ceiling perimeter at second floor walls and cover insulation with wall board
  - j. Add 9" insulation to attics and provide baffles at eaves

#### **MECHANICAL REHAB**

- 1. Replace all boilers with new high-efficiency (90 AFUE min.) boilers
- 2. Replace all water heaters with new sealed combustion high efficiency water heaters
- 3. Replace fin-tube radiation and cabinets throughout

## NEW CONSTRUCTION

1. Construct 2 new ANSI A117.1 Type A dwelling units in a single 1-story building
  - a. Slab-on-grade with insulated perimeter and foundations. Slab to be placed over heavy duty 15 mil reinforced plastic sheet.
  - b. Wood framed building
    - i. Minimum 2x6 insulated exterior walls with weather barrier and vapor barrier
    - ii. Double stud interior unit separation wall with sound attenuation insulation and vapor barrier on one side for atmospheric separation (smoking is allowed)
    - iii. Wood roof trusses, attic insulation, eave insulation baffles, vapor barrier, and asphalt shingles over underlayment and ice and water shield at perimeter. Gutters and downspouts to control drainage and prevent erosion.
2. Demo 7 townhome units to make way for new accessible dwelling unit
  - a. Convert former party-wall to exterior walls at 1 location
  - b. Reconfigure mechanical room in building 6B to replace function of demolished mechanical room in building 6B.
3. Construct new common building
  - a. Slab-on-grade with insulated perimeter and foundations. Slab to be placed over heavy duty 15 mil reinforced plastic sheet.
  - b. Wood framed building
    - i. Minimum 2x6 insulated exterior walls with weather barrier and vapor barrier
    - ii. wood roof trusses, attic insulation, eave insulation baffles, vapor barrier, and asphalt shingles over underlayment and ice and water shield at perimeter. Gutters and downspouts to control drainage and prevent erosion.
  - c. FOB access at exterior entrance door
  - d. 3 offices
    - i. Safe room for files and staff
    - ii. FOB access
  - e. Laundry room with 6 washing machines, 6 dryers and counters
    - i. FOB access
  - f. Community room with kitchen consisting of upper and lower cabinets, counter, sink refrigerator, and counter-top microwave oven
    - i. Kitchen in 'pantry' that can be closed from main community room
    - ii. FOB access
  - g. Front- load mailboxes for 67 units and office
  - h. Restrooms
  - i. Mechanical room
  - j. Security cameras at office and other interior rooms
4. New head end for security cameras

c: LHB Project No. 200071

August 12, 2021

VIA E-MAIL

Aaron Keniski  
Multifamily Programs  
Minnesota Housing Finance Agency  
400 Wabasha Street North, Suite 400  
St. Paul MN 55102

RE: Proposed Windwood Townhomes Project, 807 Upham Road  
Duluth, Saint Louis County  
SHPO Number: 2021-2206

Dear Mr. Keniski,

Thank you for initiating consultation with our office regarding the above-referenced project. Information received in our office via e-mail on June 21, 2021 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) and its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800).

We have completed a review your letter dated June 21, 2021, a submission which provides documentation in support of your agency's defined undertaking and corresponding Area of Potential Effect:

- Windwood Townhomes/807 Upham Project Location and Proposed APE Maps;
- Windwood Townhomes Building Exterior Current Photographs (6 pages);
- Site Plan, New Building and Rehabilitated Townhome Renderings (dated 7/1/2020); and
- Windwood Townhomes Scope of Work Narrative Outline (dated 7/7/2021).

Our comments on this submission are provided below.

**Define Federal Undertaking and Determine the Area of Potential Effect**

We understand by your June 21<sup>st</sup> letter that the federal undertaking includes extensive rehabilitation, both interior and exterior, of the existing Windwood Townhomes buildings as well as construction of a new accessible townhome structure and new community building. We understand that the construction of the new accessible townhome structure will require removal of an existing building.

Considering the scope and nature of the proposed federal undertaking, and the extant site and adjacent conditions, we agree that the Area of Potential Effect (APE) as defined and documented in your June 21<sup>st</sup> letter is generally appropriate to take into account the potential direct and indirect effects of the proposed undertaking as we currently understand it.

We look forward to consulting with your agency and others as the Section 106 review moves forward. Feel free to contact me at (651) 201-3290 or by e-mail at [sarah.beimers@state.mn.us](mailto:sarah.beimers@state.mn.us) if you have any questions regarding this comment letter.

Sincerely,



Sarah J. Beimers  
Environmental Review Program Manager

---

**MINNESOTA STATE HISTORIC PRESERVATION OFFICE**

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

[mn.gov/admin/shpo](http://mn.gov/admin/shpo) ■ [mnshpo@state.mn.us](mailto:mnshpo@state.mn.us)

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER



NEW HISTORY

PHASE I AND II ARCHITECTURAL  
HISTORY SURVEY

Windwood Townhomes Renovation

Duluth, St. Louis County,  
Minnesota  
August 2021

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## 1.0 MANAGEMENT SUMMARY

In 2021, Center City Housing Corp. began planning for a renovation of the Windwood Townhomes at 807 Upham Road East in the Duluth Heights neighborhood of Duluth, Minnesota. The renovation will receive funding from the United States Department of Housing and Urban Development (HUD). As a federal undertaking, the project is subject to a Section 106 review under Section 106 of the National Historic Preservation Act of 1966. On June 21, 2021, Minnesota Housing, acting on behalf of HUD, initiated consultation with the Minnesota State Historic Preservation Office (SHPO). On August 12, 2021, the SHPO assigned the compliance number 2021-2206 to this project.

An Area of Potential Effect (APE) for the project was reviewed and approved by the SHPO on August 12, 2021 (see Figure 1). The APE encompasses approximately 11.3 acres and includes five (5) properties:

- Bayview Manor Apartments at 621 Upham Road East (1972)
- Windwood Townhomes (historically Viking Townhouse Apartments) at 807 Upham Road East (1972)
- Office building at 639 East Central Entrance (1996)
- Office building at 715 East Central Entrance (1996)
- Apartment building at 220 Pecan Avenue (1995)



**Figure 1:** Area of Potential Effect (APE). APE is outlined in red. Windwood Townhomes are outlined in blue. Map courtesy of St. Louis County.

As required under Section 106, a reconnaissance-level survey of the APE was conducted to identify historic properties. Only two (2) properties within the APE, 621 Upham Road East and 807 Upham Road East, are 45 years or older and could therefore be inventoried. Both of these properties were also surveyed at the Phase II intensive level. New History completed the Phase I and II field work on July 16, 2021. Lauren Anderson was the principal investigator.

Both 621 Upham Road East and 807 Upham Road East are recommended as not eligible for the National Register of Historic Places.

I certify that this investigation was conducted and documented according to the Secretary of the Interior's Standards and Guidelines and that the report is complete and accurate to the best of my knowledge.

Signature Here: *Lauren Anderson*

Date: 8/12/2021

## 2.0 METHODOLOGY

The primary objective of this project, which included development of a historic context and Phase I and II surveys, was to identify historic properties within the APE. All work was conducted in accordance with the SHPO's *Historic and Architectural Survey Manual* (June 2017) and the National Park Service's *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. The Principal Investigator meets the Secretary of the Interior's Professional Qualification Standards in History and Architectural History.

### 2.1 LITERATURE SEARCH

A literature search was conducted to identify previous research that would aid in the identification of historic properties within the APE. In addition to the SHPO database and inventory files, secondary sources at repositories such as the Duluth Public Library and the Hennepin County Library were consulted. No properties within the APE were found to have been previously surveyed.

### 2.2 HISTORIC CONTEXT

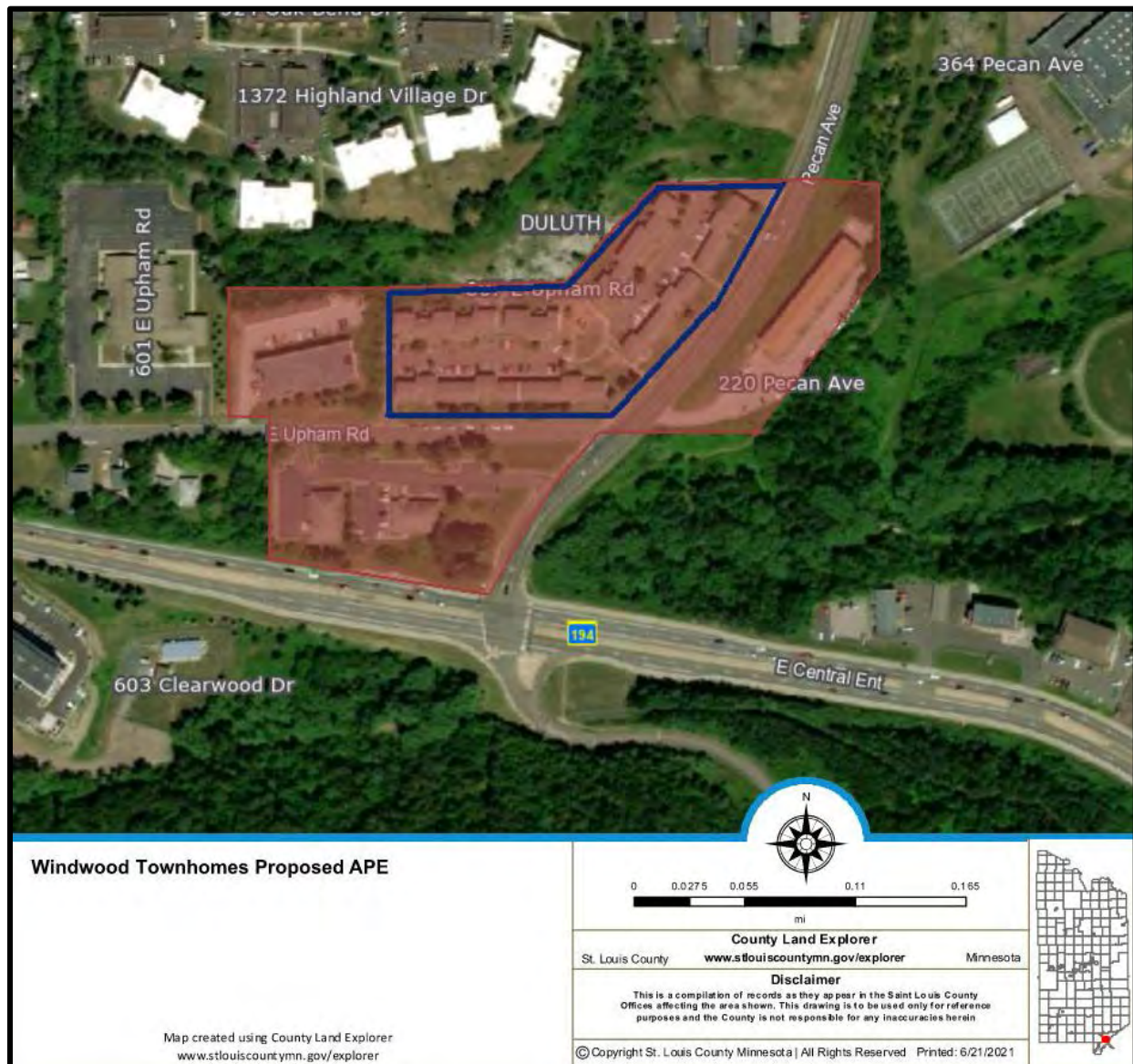
In order to evaluate the NRHP eligibility of multi-family housing within the APE, a historic context on postwar multi-family housing in Duluth was prepared. The temporal limits of the context are 1945 – 1980, reflecting the resumption of residential construction across the United States following the end of World War II and the end of Duluth's postwar multi-family housing boom around 1980. The geographic boundaries of the context are limited to the City of Duluth.

Archival research was completed through online and physical repositories, including the Duluth Public Library and the University of Minnesota-Duluth Kathryn A. Martin Library Archives and Special Collections. Archival materials were also provided by the City of Duluth and Center City Housing Corp. Secondary sources, including a previous report prepared by the author on elderly public housing in Minneapolis, were also consulted. Resources consulted are listed in the Bibliography section of this report.

## 2.3 SURVEY

New History completed a Phase I reconnaissance-level survey of the APE (see Figure 2), which includes five (5) properties:

- Bayview Manor Apartments at 621 Upham Road East (1972)
- Windwood Townhomes (historically Viking Townhouse Apartments) at 807 Upham Road East (1972)
- Office building at 639 East Central Entrance (1996)
- Office building at 715 East Central Entrance (1996)
- Apartment building at 220 Pecan Avenue (1995)



**Figure 2:** Area of Potential Effect (APE). APE is outlined in red; Windwood Townhomes are outlined in blue. Map courtesy of St. Louis County.

In accordance with SHPO guidance, all properties within the APE 45 years of age or older were inventoried. This included two (2) properties: 621 Upham Road East and 807 Upham Road East. Both of these properties were surveyed at the Phase II intensive level, with appropriate archival research, fieldwork, and documentation. The Phase I and II field work was completed by New History on July 16, 2021.



**Figure 3:** Phase II Survey Area. Map courtesy of St. Louis County.

New History evaluated surveyed properties against National Register of Historic Places (NRHP) criteria to make a recommendation on NRHP eligibility (For an explanation of how NRHP criteria were applied to surveyed properties, see Section 3.3 of this report.) Recommendations for both properties were recorded on Minnesota Architecture–History Inventory Forms and in Section 4 of this report. Because Windwood Townhomes at 807 Upham Road East contains six buildings, an individual inventory form was prepared for each building as well as one multiple property form for the entire complex.

Final deliverables will include digital and hard copies of this survey report, including all inventory forms, to be delivered to Center City Housing Corp and Minnesota Housing as well as the SHPO.

## 3.0 HISTORIC CONTEXT

### 3.1 STATEMENT OF CONTEXT

This context provides an overview of multi-family housing constructed in the city of Duluth between 1945 and 1980. In the fifteen or so years immediately following World War II, Duluth experienced relatively limited multi-family housing construction, with development limited to a few scattered apartment buildings and the city's first low-income family housing project. Beginning in the 1960s, Duluth's multi-family housing exploded, with complexes designed for all income levels and ages. Low-rise apartment buildings transitioned from the austere garden-style apartments of the 1950s to club-style luxury apartments; mid and high-rise apartment buildings, townhomes, and condominiums were also developed. The Duluth Housing and Redevelopment Authority constructed low-income public housing for families on complexes and scattered sites, as well as high-rises for the elderly, while private and non-profit developers during the 1960s leveraged new federal subsidy programs to build and operate affordable housing. By the time Duluth's multi-family construction boom came to an end around 1980, dozens of multi-family buildings and complexes had been added to the city's landscape, many of which remain today.

## 4.0 PHASE I AND II SURVEY RESULTS AND RECOMMENDATIONS

Five (5) properties are located in the APE. Two (2) of these properties – 621 Upham Road East and 807 Upham Road East – meet the minimum inventory criteria and were inventoried as part of a Phase I and II survey. All inventoried properties are recommended as not eligible for the NRHP.

**Table 4: Inventoried properties within the APE**

Historic Name	Address	Inventory No.	Date of Construction	NRHP Recommendation
Bayview Manor Apartments	621 Upham Rd. E.	SL-DUL-3626	1972	Not eligible
Viking Townhouse Apartments Complex	807 Upham Rd. E.	SL-DUL-3627	1972	Not eligible
Viking Townhouse Apartments, Bldg. 1	807 Upham Rd. E.	SL-DUL-3628	1972	Not eligible
Viking Townhouse Apartments, Bldg. 2	807 Upham Rd. E.	SL-DUL-3629	1972	Not eligible
Viking Townhouse Apartments, Bldg. 3	807 Upham Rd. E.	SL-DUL-3630	1972	Not eligible
Viking Townhouse Apartments, Bldg. 4	807 Upham Rd. E.	SL-DUL-3631	1972	Not eligible
Viking Townhouse Apartments, Bldg. 5	807 Upham Rd. E.	SL-DUL-3632	1972	Not eligible
Viking Townhouse Apartments, Bldg. 6	807 Upham Rd. E.	SL-DUL-3633	1972	Not eligible

Three (3) properties within the APE are significantly younger than 45 years and therefore do not meet the minimum inventory criteria for Phase I survey. These properties were not inventoried.

**Table 5: Non-inventoried properties within the APE**

Historic Name	Address	Date of Construction
Office building	639 East Central Entrance	1996
Office building	715 East Central Entrance	1996
Apartment building	220 Pecan Avenue	1995

### 3.3 ASSOCIATED PROPERTY TYPES AND RELATIONSHIP TO NATIONAL REGISTER CRITERIA

Property types associated with the theme of multi-family housing within the historic context *Multi-Family Housing in Duluth, 1945 - 1980* will be located within the boundaries of the City of Duluth. The properties will have achieved significance between 1945 and 1980, and will demonstrate historic significance under one or more designation criteria in connection to the theme of multi-family housing. This section describes the property types most likely to be associated with this theme, and the associated property types' relationship to NRHP designation criteria.

#### Associated Property Types

Specific property types associated with the theme of multi-family housing development within the historic context *Multi-Family Housing in Duluth, 1945 - 1980* are listed below. Of the property categories acknowledged by the NRHP (buildings, structures, sites, districts, and objects), properties associated with this theme are most likely to be buildings or districts. Property types may include:

- Duplexes, triplexes, and fourplexes
- Low-rise townhouses, garden apartment buildings, or club-type apartment buildings and complexes
- Mid or high-rise apartment buildings and complexes

These property types may have the following associative characteristics related to ownership structure, financing/operation, and developer type:

Ownership structure:

- Rental
- Private ownership (condominiums and townhomes)
- Association membership

Financing/operation:

- Private
- Subsidized (financed and/or operated with state or federal aid)
- Public (developed and operated by the Duluth HRA)

Developer type:

- Private
- Non-profit
- Duluth HRA

#### Associated Properties' Relationship to National Register of Historic Places Criteria:

In order to be considered eligible for the NRHP, properties must have obtained significance for one of the four National Register Criteria for Evaluation. The following section provides suggestions on how properties associated with the theme of multi-family housing development in Duluth might be evaluated

for significance under these four criteria. The term “subject property” is used to refer to properties associated with this theme. For additional information, see the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*.<sup>82</sup>

### **Criterion A: Association with Significant Events**

According to the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, to be considered eligible for the NRHP under Criterion A, subject properties must be “associated with events that have made a significant contribution to the broad patterns of our history.” These events include 1) “a specific event marking an important moment in American prehistory or history” and 2) “a pattern of events or a historic trend that made a significant contribution to the development of a community, a state, or the nation.”

Within the context *Multi-Family Housing in Duluth, 1945 - 1980*, such events and trends would be linked to at least two Areas of Significance defined by the National Park Service in the National Register Bulletin *How to Complete the National Register Registration Form*.<sup>83</sup> These include:

- Community Planning and Development: “the design or development of the physical structure of communities”
- Social History: “the history of efforts to promote the welfare of society; the history of society and the lifeways of its social groups”

Subject properties may be considered for significance under Criterion A within these Areas of Significance. For example, the city’s first low-income elderly housing apartment building might be eligible under Criterion A in the area of Community Planning and Development as a representation of the development of Duluth’s public housing program. The period of significance for a subject property evaluated under Criterion A should reflect the time period during which the property achieved significance. The level of significance will likely be local, but could have statewide or even nationwide significance depending on the history of the property.

### **Criterion B: Association with Significant Persons**

According to the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, to be considered eligible for the NRHP under Criterion B, properties must be “associated with the lives of persons significant in our past.” A significant individual is one “whose activities are demonstrably important within a local, State, or national historic context.” Within the context *Multi-Family Housing in Duluth, 1945 - 1980*, the individual will have achieved significance within the realm of the city’s multi-family housing development. To be significant for association with an individual, a subject property must have been associated with the individual during the time when he or she achieved significance, and the property must be the best illustration of that individual’s achievements. The individual must have directly influenced the conception and/or development of the property. The length of association with the

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<sup>82</sup> National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, available at [https://www.nps.gov/subjects/nationalregister/upload/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf).

<sup>83</sup> For a complete list of Areas of Significance, see the National Park Service’s National Register Bulletin *How to Complete the National Register Registration Form*, available at <https://www.nps.gov/subjects/nationalregister/upload/NRB16A-Complete.pdf>.

individual in comparison with other associated properties, such as their personal residence, should also be considered. For example, an apartment building constructed by an innovative non-profit housing developer is more likely to be eligible for the NRHP if the developer's offices or headquarters are no longer extant. Properties identified as the best representation of an individual's contributions might be eligible under Criterion B in the Areas of Significance of Community Planning and Development, Social History, or Commerce, though other categories might apply depending on the nature of the individual's accomplishments.

The period of significance should reflect the time period during which the individual achieved significance and was associated with the property. The level of significance will likely be local, but could have statewide or even nationwide significance depending on the nature of the individual's accomplishments. Properties significant for association with notable architects or contractors should be considered under Criterion C.

### **Criterion C: Design/Construction**

According to the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, to be considered eligible under Criterion C, properties must "embody the distinctive characteristics of a type, period, or method of construction, or...represent the work of a master, or...possess high artistic values, or...represent a significant and distinguishable entity whose components may lack individual distinction." Properties that represent a type, period, or method of construction are those that illustrate, through distinctive features, a particular architectural style or construction method. They might illustrate "the pattern of features common to a particular class of resources, the individuality or variation of features that occurs within the class, the evolution of that class, or the transition between classes of resources." These properties might be significant in the Areas of Significance of Engineering, "the practical application of scientific principles to design, construct, and operate equipment, machinery, and structures to serve human needs," or Architecture, "the practical art of designing and constructing buildings and structures to serve human needs." For subject properties to be considered eligible under Criterion C in this historic context, they must exemplify design trends, methods of construction, or a class of resources specific to the theme of multi-family housing. For example, a multi-family housing development that represents the high-rise luxury apartment type constructed during the postwar era might be eligible under Criterion C as an example of that building type. Or, a housing complex developed by the Duluth HRA might be eligible under Criterion C as representative of the work of a well-known architectural firm specializing in public housing.

All properties designated under Criterion C should have a period of significance synonymous with their date of construction. The level of significance will likely be local, but could have statewide or even nationwide significance depending on the influence or noteworthiness of the building type or design, or importance of the individual who designed or constructed the property.

### **Criterion D: Information Potential**

To be considered eligible under Criterion D, properties must "have yielded, or may be likely to yield, information important in prehistory or history." Subject properties are unlikely to be eligible under Criterion D, though a subject property which is the only surviving record of a particular structural system or use of a material might qualify under this category.

Subject properties located on land cleared of previous buildings may rest on urban archaeological sites that might contain information important in history or prehistory. These sites, however, are not related to the subject properties themselves and cannot be evaluated under the theme of multi-family housing development within this context; therefore, subject properties cannot be considered eligible for the NRHP under Criterion D for their archaeological potential.

Any remnants of the built environment uncovered should be evaluated for significance under their appropriate historic contexts by archaeologists who meet the Secretary of the Interior's Qualifications for Archaeology. New History does not employ archaeologists and has not evaluated resources identified in this historic context or the associated survey for information potential under Criterion D.