



Planning & Development Division
Planning & Economic Development Department

Room 160
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Duluth, Minnesota 55802



218-730-5580



planning@duluthmn.gov

DATE: January 05, 2026

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

FROM: Jenn Moses, Planning Manager

SUBJECT: Final 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 354 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 6th 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 the Final Order for Review. The Scoping Document was published on November 25, 2025, for review and comment as part of the AUAR process as described in Minnesota Rules, part 4410.3610, subpart 5a. A public hearing was held by the Planning Commission on December 9, 2025.

Attachment A provides responses to all comments received on the Scoping Document by the December 26, 2025 deadline. Attachment B provides the comment letters received on the Scoping Document. By

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approval of this order, comment responses are accepted and will be forwarded to commenters along with this Final Order for Review.

AUAR Area

The AUAR area includes an approximately 354-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). At the request of the Planning Commission during the December 9, 2025 meeting, two additional areas were added into the AUAR area boundary to align more closely with the Medical Regional Exchange District.

Development Scenarios

Two development scenarios will be considered as part of the Draft 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 (commercial and residential) redevelopment of key sites within the broader downtown area. Figure 2 and Figure 3 depict Scenario B (Existing Conditions) and Scenario A (Maximum Development), respectively.

Table 1: AUAR Development Scenarios

Description	Scenario A - Existing Conditions	Scenario B – Maximum Development
Total Project Acreage	Total approx. 354	Total approx. 354
Linear Project length	Not applicable (N/A)	N/A
Residential building area (in square feet)	2,146,000	4,516,000
Commercial building area (in square feet)	6,003,000	6,073,000
Industrial building area (in square feet)	67,000	67,000
Institutional building area (in square feet)	4,160,000	4,435,000
Other uses – Tourism (in square feet)	540,000	869,000
Total Project Square Footage	12,916,000	15,960,000
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. (approx. 10 stories)
Essentia Subarea		
Subarea Acreage	Approx. 97	Approx. 97
Residential building area (in square feet)	618,000	1,568,000
Commercial building area (in square feet)	1,209,000	1,259,000
Industrial building area (in square feet)	14,000	14,000
Institutional building area (in square feet)	2,475,000	2,750,000
Other uses – Tourism (in square feet)	174,000	410,000
Total Project Square Footage	4,490,000	6,001,000
Structure height (feet)	Up to 18 stories (St. Mary's Medical Center)	Up to 200 ft. (approx. 20 stories)
1st Street Subarea		
Subarea Acreage	Approx. 141	Approx. 141
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	5,695,000

Description	Scenario A - Existing Conditions	Scenario B – Maximum Development
Structure height (feet)	Up to 15 stories (Alworth Building)	Up to 200 ft. (approx. 20 stories)
Secondary Subarea		
Subarea Acreage	Approx. 98	Approx. 98
Residential building area (in square feet)	720,000	846,000
Commercial building area (in square feet)	809,000	809,000
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	3,243,000	3,369,000
Structure height (feet)	Up to 114 ft. (St. Luke's Hospital)	Up to 200 ft. (approx. 20 stories)

Staff Recommendation

Staff recommend that the Planning Commission adopt the Final Order for Review to prepare the Downtown Duluth Draft AUAR.

Figure 1: AUAR Area



Figure 2: Development Scenario A – Existing Conditions

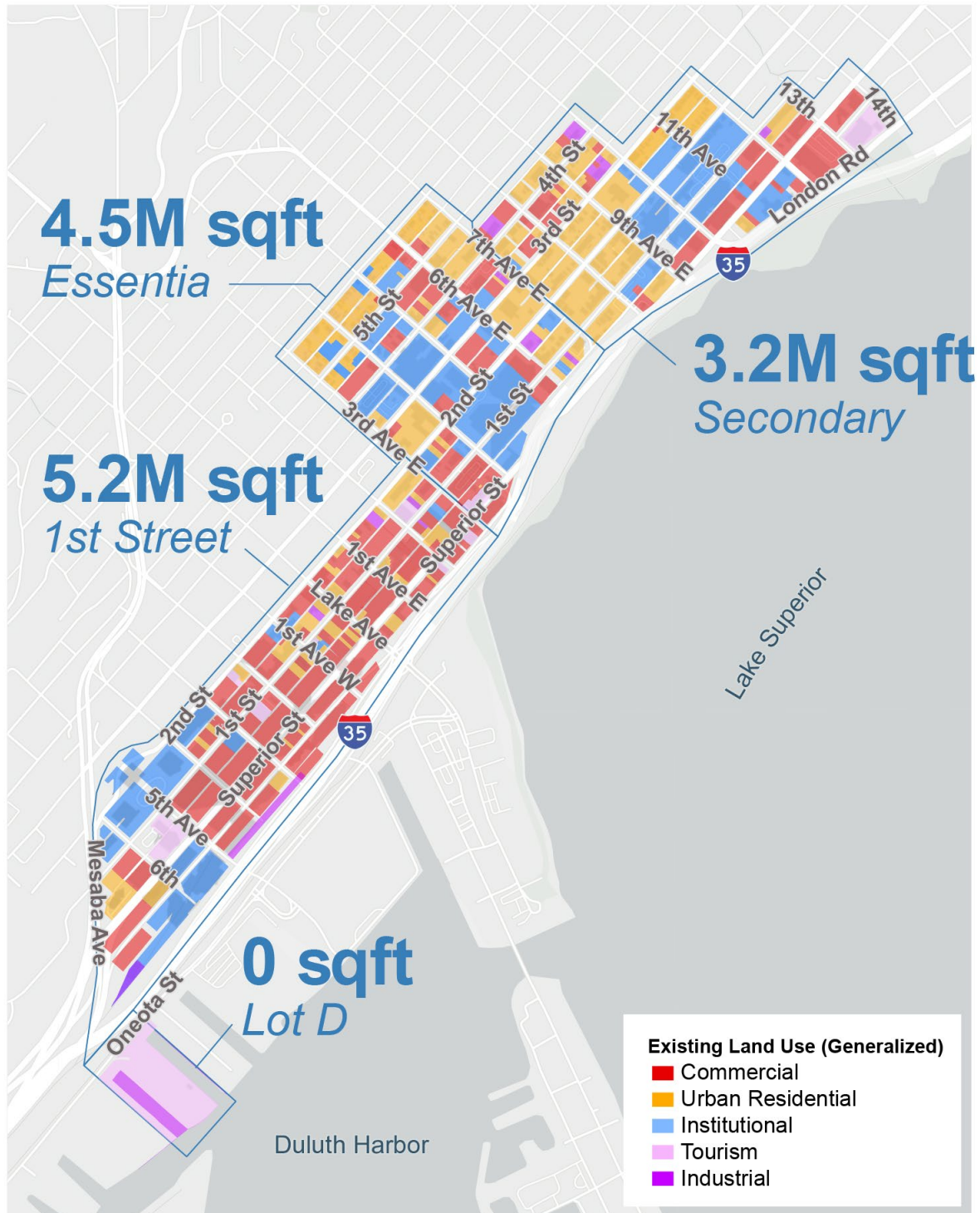
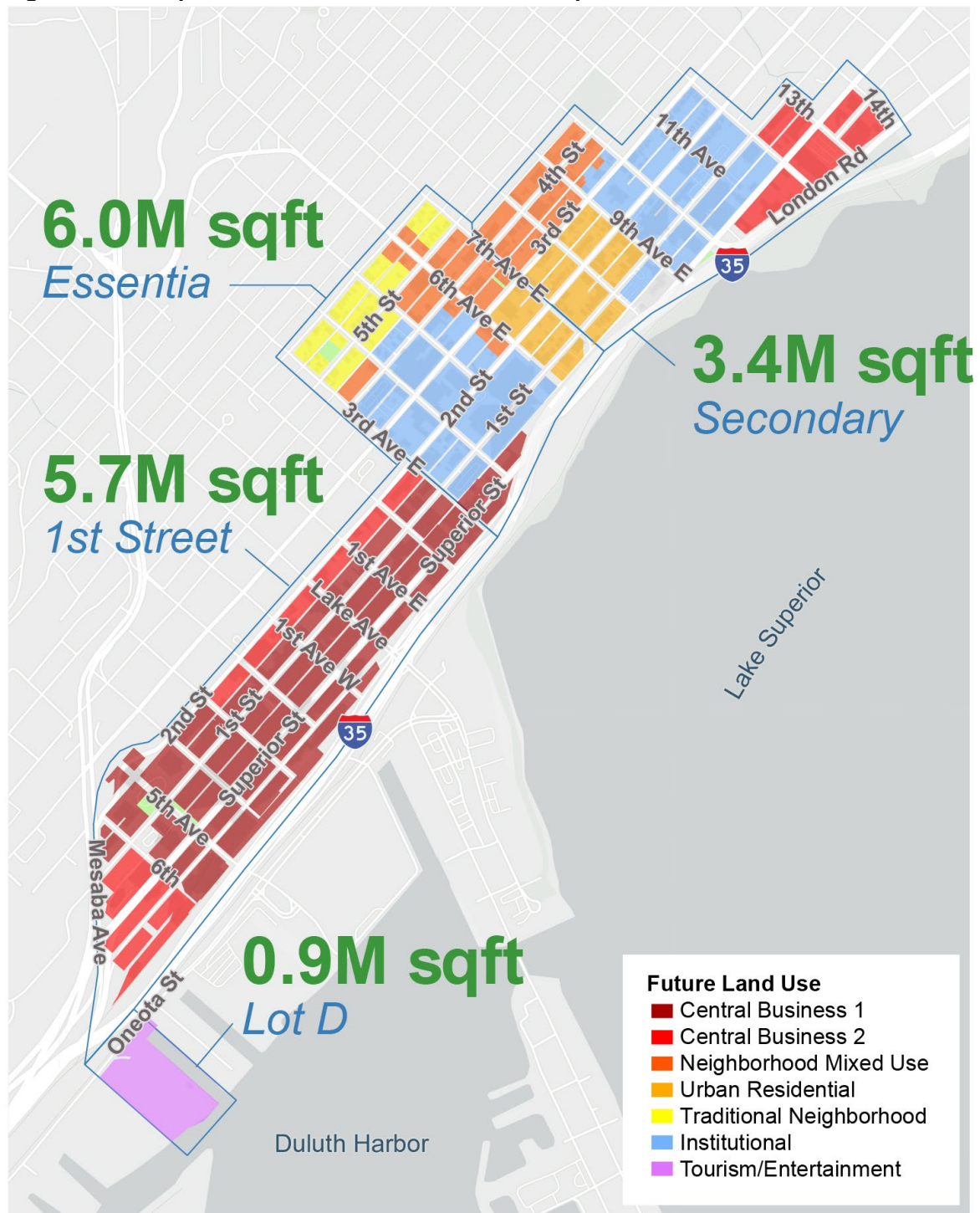


Figure 3: Development Scenario B – Maximum Development



Attachment A – Scoping EAW Responses to Comments

Attachment A – Scoping EAW Responses to Comments

The Scoping Environmental Assessment Worksheet (EAW) for the Downtown Duluth Alternative Urban Areawide Review (AUAR) was prepared and published for public comment in accordance with the Minnesota Rules, part 4410.3610, subpart 5a. The purpose of the Scoping EAW was to provide information, seek input on the proposed scope of analysis for the AUAR, establish the boundaries of the AUAR, and identify the development scenarios to be analyzed through this review.

The Scoping EAW was published on November 25, 2025, and distributed to the Environmental Quality Board (EQB) and persons and agencies on the official EQB distribution list in accordance with EQB rules.

Notices concerning the availability of the document and comment period were posted in the Duluth News Tribune on November 29, 2025, December 6, 2025, December 13, 2025, and December 20, 2025. The document was made available in the Duluth City Hall (411 West First Street, Duluth, MN 55802) and on the City's website at <https://duluthmn.gov/planning-development/land-use-zoning-and-applications/environmental-reviews/>. The Duluth City Planning Commission held a public hearing on December 9, 2025. The 30-day comment period expired on December 26, 2025.

The RGU must consider all timely and substantive comments received when finalizing the order for review in accordance with Minnesota Rules part 4410.3610, Subpart 5a(C). As required by MN Rules, the RGU has provided replies to comments that are substantive. Four agency and one citizen comment letters were received on the Scoping EAW. Comments received by these agencies and the public are summarized below by commenter and subject matter. Copies of all comment letters submitted are included in Attachment B in the order shown below.

Agency/Organization/Citizen	Letter Dated	Signatory
U.S. Army Corps of Engineers (USACE)	November 25, 2025	Andrew Chambers, Regulatory Lead Project Manager
Minnesota Department of Agriculture (MDA)	December 12, 2025	Michael Zastoupil, Agricultural and Food Systems Planner
Minnesota Department of Natural Resources (DNR)	December 22, 2025	Jessica Parson, Northeast Regional Environmental Assessment Ecologist
Minnesota Department of Transportation (MnDOT)	December 26, 2025	Maren Webb, MPP, Principal Planner, District 1
Commentor #1 -	December 5, 2025	Diane Desotelle

None of the comments received suggested alternative development scenarios to the two described in the Scoping EAW. Therefore, the Draft AUAR will analyze the development scenarios presented in the Scoping EAW.

Item 7. Climate Adaptation and Resilience

1. **Comment:** Where is the reference and guidance from the City's Climate Action Plan?

Commentor: Commenter #1 - Desotelle

Response: The Draft AUAR will include a discussion of the City's Climate Action Plan and adaptation considerations identified in the plan.

2. **Comment:** Potential adaptations should include green roofs, heat pumps, solar, tree plantings for shade etc. Any they should be required to meet the City's climate action goals.

Commentor: Commenter #1 - Desotelle

Response: Refer to the response to Comment #1.

3. **Comment:** and they [potential adaptations] will reflect the goals of the city's climate action plan

Commentor: Commenter #1 - Desotelle

Response: Refer to the response to Comment #1.

Item 8. Cover Types

1. **Comment:** [...] and support goals of the city's comp plan, climate plan, parks plan and natural resources mgmt. program plan [pertaining to future land cover for Scenario B]

Commentor: Commenter #1 - Desotelle

Response: Plans will be evaluated in the Draft AUAR under Item 10 (land use). The Draft AUAR will highlight places where there are any incompatibilities between adopted plans, such as those mentioned in the comment, and the proposed development scenarios. Incompatibilities will be addressed through mitigation proposed in the Draft AUAR.

Item 10. Land Use

1. **Comment:** [...] MDA believes that opportunities exist for the inclusion of local food production within the Downtown Duluth AUAR. Community gardens would fit well into areas designated for Neighborhood Mixed Use, Urban Residential, and Open Space throughout the AUAR. A community garden would also add value in Lot D next to the multi-family housing units. Rooftop gardens and Controlled Environment Agriculture (also known as indoor agriculture) could be incorporated into any of the business districts as well. Making space for a small urban farm next to the healthcare facilities in the Institutional areas could fit well with Essentia Health or Aspirus St. Luke's produce

prescription or other nutrition programs in the future. Urban farms typically require more zoning changes to allow for structures like hoop houses, greenhouses, etc.

Finally, setting aside land for local food production in the Downtown Duluth AUAR can help the City of Duluth advance further in the GreenStep Cities program through Best Practice #27: Local Food as well as the new Gold Leaf Challenge.

Commentor: MDA

Response: The development scenarios studied in this AUAR in no way prohibit the ability for willing developers or entities to include local food production in their developments or properties. While the City cannot require private landowners to consider local food production, it can encourage this type of use by adding flexibility to the zoning code. Local food production will be considered as an optional mitigation measure in both Item 7 Climate and Resilience and Item 10 Land Use.

2. **Comment:** [Add] The St. Louis River Area of Concern Plan, Duluth Natural Resources Mgmt Program Plan, Duluth Stormwater Plan and Duluth Climate Action Plan

Commentor: Commenter #1 - Desotelle

Response: These plans will be added to the list of plans reviewed in the Draft AUAR.

Item 12. Water Resources

1. **Comment:** If the proposal involves activity in navigable waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 (Section 10). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit.

If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (CWA Section 404). Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps evaluation of a Section 10 and/or a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

Commentor: USACE

Response: Potential Section 10 and/or Section 404 permit requirements are identified in Table 6, Permits and Approvals of the Scoping EAW. The Draft AUAR will include a discussion of the potential permit requirements pertaining to waters of the United States and includes these in the mitigation plan.

2. **Comment:** Public waters rules state that fill may not exceed more than a minimum encroachment, change, or damage to the environment. Minnesota Rule 6115.0190 Subpart 3B states that placement of fill within public waters strictly to create upland is prohibited. Minnesota Rule 6115.0191 Subpart 4 includes requirements for reclaiming shoreline lost to erosion. Typically, no more than 400 square feet may be reclaimed unless the loss of shoreline is a threat to health and safety through the impending loss or damage to existing shoreline development; or the loss occurred because of changes in water levels caused by artificial manipulation not more than 5 years prior. There is no existing shoreline development at risk on Lot D and the shoreline eroded more than 5 years ago. The failed portions of the historic seawall should be considered for removal from the public water as part of the project because they no longer serve public interest, and they could be hazardous to navigation.

Commentor: DNR

Response: Comment noted. Public water rules pertaining to shoreline reclamation and placing of fill within Public Waters will be described in the Draft AUAR. Proposed improvements to the existing seawall along Lot D are conceptual. Preliminary design of the proposed seawall improvements has not been completed. At the time that the design of the seawall improvements project is underway, the City and the design team will coordinate with the DNR to ensure that proposed improvements adhere to state shoreline rules.

3. **Comment:** The concept plan shows large areas of impervious surface within the shore impact zone in the form of plazas. It would be more appropriate for these areas to be replaced with green space and shoreland buffers. Native shoreline vegetation provides several benefits that impervious surfaces do not including slowing stormwater runoff; absorbing wind/wave energy; filtering nutrients/pollutants; limiting suspended sediments; and providing fish and wildlife habitat. The concept plan also shows an impervious walkway within the shore impact zone around the perimeter of the site. It is not clear if this walkway is for public use. Please clarify if the walkway is intended to be open to public use, or if it is intended as private infrastructure. Additionally, please identify if there are other areas of the site/waterfront that will be accessible by the public.

Because the site is no longer under industrial use and there appears to be no need for direct shoreland docking around the entire perimeter of the site, the shoreline could be re-naturalized. This could include utilizing a soft (native plantings) or hybrid shoreline (native plantings and riprap) design approach rather than reconstructing a seawall. These design approaches could both address shoreline erosion and give the shoreline a more natural appearance consistent with shoreland goals/standards.

The draft AUAR should address how the waterfront will be utilized at the site. This includes anticipated waterfront recreation and watercraft mooring needs. Docks and mooring spaces should be minimized because these structures privatize public space and increase traffic/crowding of surface waters. Excessive amounts of these structures can also be detrimental to fish habitat. Please note, a DNR public waters work permit may be required if certain dock/mooring standards are not met. Please continue close coordination with Bri Speldrich as these plans are developed.

Commentor: DNR

Response: Perpetual use of Slip No. 3 by abutting landowners is designated and permitted by right in the Bay Front Division plat. While the City understands the ecological benefits of creating natural shoreline, historic preservation concerns related to the Slips No. 1, 2, and 3 Historic District, eligible for listing in the National Register of Historic Places (NRHP), must also be considered. It is anticipated that redevelopment of Lot D and the associated seawall improvements will be closely coordinated with the Minnesota State Historic Preservation Office (SHPO) and Duluth Heritage Preservation Committee (HPC).

The Lot D concept plan, proposed by Inland Development Partners, is a preliminary concept and specific details on the potential plaza, walkway, and waterfront access have not been determined. At this time, it is anticipated that a public walkway and waterfront access may be proposed, similar to the waterfront access and walkways constructed at the adjacent Pier B Hotel within the past ten years. Extending the City's existing local pedestrian network and ensuring compliance with federal, state, and local historic preservation requirements will be an important consideration in the future redevelopment of Lot D.

The City will continue to closely coordinate with the DNR, as the proposed design of the Lot D redevelopment project and associated seawall improvements develops to identify opportunities to utilize native vegetation and natural shoreline where feasible and address the DNR's concerns related to shoreline restoration and aquatic habitat.

4. Comment: The environmental effects of the following should be disclosed and evaluated further, and may be required for permitting:

- Number and size of mooring spaces anticipated for the site
- Number of mooring spaces that will be utilized by residents/hotel guests and the number that will be utilized by non-residential or non-lodging commercial uses (restaurants, bars, etc.)

- The layout and square footage of docks
- Total maneuvering area needed for watercraft
- Future creation/excavation of new slips
- Water recreation facilities or ancillary services (boat ramps, rentals, saunas, etc.)
- Changes in impervious surface; (with a goal of no net increase)
- Expand upon noxious weed prevention and management plans
- Expand upon potential for increased traffic and use of nearby parks, trails, and other facilities and identify if additional considerations (such as trail erosion or stream sedimentation) should be mitigated.

Commentor: DNR

Response: The Draft AUAR will include preliminary information based on the Lot D concept plan, including approximately impervious surface area changes, waterfront plaza, connections to the public walkway network, and mitigation measures pertaining to noxious weed prevention and management. The specific details of the proposed reconstruction of the existing seawall, potential water recreation facilities, and proposed dock details are not available at this time as the Lot D project design has not advanced to a point where this has been determined. The AUAR mitigation plan will identify a need to coordinate with the DNR as the design develops and identify state and federal permit requirements pertaining to impacts to waters of the United States and DNR Public Waters.

5. **Comment:** In a previous early coordination meeting in which MN DNR staff attended, it was noted that commercial vessels may temporarily moor at this site. There was also discussion of extending the Lakewalk to this site and potentially re-excavating historic Slip 4. These activities are likely to have public water impacts, require additional permitting, and their environmental effects should be addressed in the draft AUAR.

Commentor: DNR

Response: The potential for boat slip access to Lot D and extending the existing Bayfront Walkway to Lot D may be considered as the redevelopment project advances. Currently, the re-excavation of historic Slip No. 4 is not proposed.

Item 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

3. **Comment:** MNDNR Issued a Natural Heritage Review letter, MCE #2025-00850, for this project on December 12, 2025 (see attached). It appears that there are rare features and state-listed species in the vicinity of the project. Please follow all guidance outlined in the Natural Heritage Review Letter.

Commentor: DNR

Response: The DNR's Natural Heritage Review letter (MCE #2025-00850) was received and will be incorporated into the Draft AUAR.

Item 17. Air

1. **Comment:** There is opportunity to consider reduced traffic in areas to not only increase walker/biker/disability and DTA services, but to reduce emissions and noise in some corridors

Commentor: Commenter #1 - Desotelle

Response: Comment noted. The Draft AUAR will discuss opportunities for expanding alternative transportation modes to the AUAR subareas. Scenario B evaluates opportunities to increase residential development in downtown core. Redevelopment and infill development of the downtown inherently provides opportunities to reduce vehicle emissions by increasing population density near major employers and commercial areas, where pedestrian/bicyclist infrastructure may be utilized as an alternative to personal vehicles.

Item 18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

1. **Comment:** And the City's Climate Action Plan

Commentor: Commenter #1 - Desotelle

Response: The Draft AUAR will include a discussion of the City's Climate Action Plan and adaptation considerations identified in the plan.

2. **Comment:** [And] renewable energy, heat pumps

Commentor: Commenter #1 - Desotelle

Response: The Draft AUAR will include a number of potential adaptation measures that may be appropriate to consider as specific projects are proposed within the AUAR area, including renewable energy and heat pumps.

3. **Comment:** and the city's greenhouse gas reduction goals

Commentor: Commenter #1 - Desotelle

Response: The Draft AUAR will acknowledge the City's greenhouse gas reduction goals in addition to goals at the state-level.

Item 19. Noise

1. **Comment:** Please add issues related to long term lower level dBA and vibrations especially next to residential areas. These issues can greatly impact human health as well.

Commentor: Commenter #1 – Desotelle

Response: Low frequency noise is sound at frequencies of less than 200 hertz (Hz). This type of sound is often described as a “rumble” and typically associated with gas combustion turbines and other sources such as helicopters, pumps, fans, etc. C-weighted (dBC) sound levels are a better indicator of presence of high sound levels at the frequencies than A-weighted sound levels. The State of Minnesota does not have dBC noise limits. As stated in the Scoping EAW, no data center or heavy industrial uses are considered in the development scenarios, that may potentially warrant a more detailed evaluation of noise impacts, such as low frequency noise.

Development Scenario B primarily proposes multi-family residential uses along with some hotel, commercial/office, and retail uses. Proposed residential uses would be considered sensitive noise receptors and would not generate significant new sources of noise. Further, noise generated by residential uses would be negligible compared to existing sources of noise in the downtown such as traffic noise associated with Interstate 35 (I-35) and other roadways, and industrial, commercial, and event activities along the waterfront and downtown. Therefore, proposed residential and commercial uses do not necessitate a quantitative noise analysis. Additionally, no road improvements that would be considered a Type I Project are proposed as part of the development scenarios; therefore, a traffic noise analysis is not warranted.

2. **Comment:** Please add issues beyond law compliance related to research from long term lower lever dBA and vibrations especially next to residential areas. These issues can greatly impact human health as well as residents on east coast are noticing with increase of data centers.

Commentor: Commenter #1 - Desotelle

Response: Refer to the preceding response to noise comment # 1.

Item 20. Transportation

3. **Comment:** On page 46, under 20a. Transportation, it is recommended that the new proposed access into the Lot D development is considered with the Traffic Impact Study (TIS).

Commentor: MnDOT

Response: Comment noted. A traffic impact study for the proposed Lot D Redevelopment Project will be included in the Draft AUAR.

4. **Comment:** On page 46, under 20a. Transportation, please be sure to include data for portion 5): availability of transit and/or other alternative transportation modes.

In relation to alternative transportation modes (walking, biking, etc.) and Lot D, Geno's Walk (BR# 69885, pedestrian bridge over I-35) will be significantly rehabbed Summer 2026. The stairs to Railroad St will be removed under this project, maintaining the ADA accessible connection/ramp.

Commentor: MnDOT

Response: Comment noted. The Draft AUAR will discuss transit and/or other alternative transportation modes. Information received pertaining to the planned improvements to Geno's Walk

(Bridge No. 69885) and ADA improvements to the stairs and Railroad Street will be included in the Draft AUAR.

Comment: On page 33, under Proposed Conditions for stormwater, there is reference to large-scale sediment channels under I-35. It is not clear whether these will be looked at specifically with this process. The document references that they "...were constructed to manage runoff generated from all the public roads, however, these channels also receive runoff that drains down the hillside from 6th Avenue West to 1st Avenue East."

Commentor: MnDOT

Response: The Draft AUAR will include a discussion of existing drainage features within the AUAR area and anticipated Stormwater BMP improvements needed to treat stormwater runoff associated with the proposed redevelopment (Scenario B). Specific improvements to existing sediment channels under I-35 are not proposed as part of the development scenarios evaluated in the Draft AUAR.

Attachment B – Comment Letters

Sejkora, Erin

From: Chambers, Andrew R CIV USARMY CEMVP (USA)
<Andrew.R.Chambers@usace.army.mil>
Sent: Tuesday, November 25, 2025 8:15 AM
To: Sejkora, Erin
Cc: Jason Mozol
Subject: RE: Downtown Duluth Scoping EAW - Comment Period Notification

You don't often get email from andrew.r.chambers@usace.army.mil. [Learn why this is important](#)

Erin,

Thanks for coordinating with the Corps on this one.

If the proposal involves activity in navigable waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 10 of the Rivers and Harbors Act of 1899 (Section 10). Section 10 prohibits the construction, excavation, or deposition of materials in, over, or under navigable waters of the United States, or any work that would affect the course, location, condition, or capacity of those waters, unless the work has been authorized by a Department of the Army permit.

If the proposal involves discharge of dredged or fill material into waters of the United States, it may be subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (CWA Section 404). Waters of the United States include navigable waters, their tributaries, and adjacent wetlands (33 CFR § 328.3). CWA Section 301(a) prohibits discharges of dredged or fill material into waters of the United States, unless the work has been authorized by a Department of the Army permit under Section 404. Information about the Corps permitting process can be obtained online at <http://www.mvp.usace.army.mil/regulatory>.

The Corps evaluation of a Section 10 and/or a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

If an application for a Corps permit has not yet been submitted, the project proposer may request a pre-application consultation meeting with the Corps to obtain information regarding the data, studies or other information that will be necessary for the permit evaluation process. A pre-application consultation meeting is strongly recommended if the proposal has substantial impacts to waters of the United States, or if it is a large or controversial project.

Let me know if you want to discuss.

Thanks!
Andy

-- --

Andrew Chambers
Regulatory Lead Project Manager
U.S. Army Corps of Engineers
Duluth Field Office
11 East Superior Street, Suite 260

Duluth, MN 55802
Cell: (218) 393-2837

Information on Corps of Engineers Regulatory Program can be found at:

<https://www.mvp.usace.army.mil/missions/regulatory>

We are pleased to introduce our new paperless communication procedures in Minnesota. Requests for action (pre-application consultations, permit applications, requests for delineation concurrences, requests for jurisdictional determinations, and mitigation bank proposals) should be sent directly to the following email:

usace_requests_mn@usace.army.mil <mailto:usace_requests_mn@usace.army.mil>. Please include the county name in the subject line of the email (e.g. Washington County). These changes will improve efficiency, reduce costs and reduce the environmental footprint. Additional information can be found in our public notice located here:

<http://www.mvp.usace.army.mil/Missions/Regulatory.aspx>

From: Sejkora, Erin <Erin.Sejkora@stantec.com>

Sent: Friday, November 21, 2025 5:12 PM

To: Sejkora, Erin <Erin.Sejkora@stantec.com>

Cc: jmoses@duluthmn.gov; Jason Mozol <jmozol@duluthmn.gov>; thobbs@duluthmn.gov; Walburg, Lauren <Lauren.Walburg@stantec.com>; Bot, Courtney <Courtney.Bot@stantec.com>

Subject: [Non-DoD Source] Downtown Duluth Scoping EAW - Comment Period Notification

Good afternoon,

The City of Duluth is accepting comments on the Scoping Environmental Assessment Worksheet (EAW) and Draft Order for Review for the Downtown Duluth Alternative Urban Areawide Review (AUAR), which will be published in the EQB Monitor on Tuesday, November 25, 2025.

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. 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 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.

An AUAR consists of three steps: Scoping EAW, Draft AUAR and Final AUAR. The Scoping EAW describes issues to be studied in the AUAR and potential data sources to be used in this analysis. The purpose of the Scoping EAW is to provide information to agencies and the public on the proposed scope of the Draft AUAR and to invite feedback on additional analysis or data sources that should be considered in the Draft AUAR. Once the Scoping EAW process and comment period has been completed, a Draft AUAR is prepared.

The Scoping EAW will be available for public comment starting on Tuesday, **November 25, 2025** and will conclude on Friday, **December 26, 2025**.

The Scoping EAW can be viewed online at the City's website:

duluthmn.gov/media/islf24ec/downtown-duluth_scoping-eaw-narrative-appendices_20251114.pdf

Please submit electronic/email comments to Jason Mozol at jmozol@duluthmn.gov with **Downtown Scoping EAW** in the subject line. If submitting comments electronically, please include name and mailing address.

Written comments should be submitted to:

Jason Mozol, Senior Planner
City Hall, Room 160
411 West First Street
Duluth, MN, 55802

The City of Duluth Planning Commission will hold a public hearing for the Scoping EAW during their next meeting on **December 9, 2025 at 5:00 pm** at City Hall location at 411 West First Street, Council Chambers, Duluth, MN 55802.

Please do not hesitate to contact me or Jason Mozol (jmozol@duluthmn.gov) if you have any questions.

Thank you,

Erin Sejkora, AICP
Associate, Project Manager
She/Her

Direct: (763) 252-6802
Mobile: (612) 258-6937
erin.sejkora@stantec.com

 *Upcoming out of office 11/24 - 11/28*

Stantec
One Carlson Parkway North, Suite 100, Plymouth MN 55447-4440, United States



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December 12, 2025

Jason Mozol
City of Duluth
411 West First Street
Duluth, MN 5802

RE: Downtown Duluth Alternative Urban Areawide Review

Dear Mr. Mozol:

The Minnesota Department of Agriculture (MDA) appreciates the opportunity to comment on the proposed Downtown Duluth AUAR.

Background

MDA has historically played a significant role in the preservation of agriculture as an industry and a vocation, as well as preserving the farmland that is the natural resource base of agriculture. We recognize that land use change is inevitable especially within urban areas. Nonetheless, agricultural production, in particular, food crops, can provide economic, environmental, and public health benefits to urban communities. We encourage the planning processes involved in guiding future land use change in Duluth to consider the benefits of incorporating local food production in plans for future development.

Local Food Production

Local food production is an umbrella term for a wide variety of activities that can be classified as either small-scale commercial or recreational. Small-scale commercial farms provide a variety of fresh food to local markets through direct sales to consumers or through sales to schools, restaurants, and retail stores. In areas proposed for commercial, industrial, light industrial, or low-density residential uses, these small businesses can be economically successful on small parcels of 'leftover' land that are oddly shaped or too small for other forms of development. Small farms can also play a role in attracting tourists to these areas.

Recreational local food production typically takes the form of community gardens, often incorporated into park and open space areas within residential areas. Community gardens can improve residents' diet, physical fitness, mental health, and social connectedness, and have even been shown to improve public safety and raise nearby property values.

Additionally, urban agriculture and community gardens can help provide environmental benefits important to cities such as combatting urban heat islands, reducing runoff, sequestering carbon, and supporting pollinators. When perennial crops such as fruit trees and bushes are planted, they can also provide shade and contribute to the tree canopy.

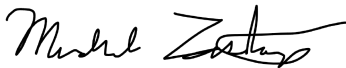
Opportunities within the Southwest Study Area AUAR

MDA believes that opportunities exist for the inclusion of local food production within the Downtown Duluth AUAR. Community gardens would fit well into areas designated for Neighborhood Mixed Use, Urban Residential, and Open Space throughout the AUAR. A community garden would also add value in Lot D next to the multi-family housing units. Rooftop gardens and Controlled Environment Agriculture (also known as indoor agriculture) could be incorporated into any of the business districts as well. Making space for a small urban farm next to the healthcare facilities in the Institutional areas could fit well with Essentia Health or Aspirus St. Luke's produce prescription or other nutrition programs in the future. Urban farms typically require more zoning changes to allow for structures like hoop houses, greenhouses, etc.

Finally, setting aside land for local food production in the Downtown Duluth AUAR can help the City of Duluth advance further in the GreenStep Cities program through Best Practice #27: Local Food as well as the new Gold Leaf Challenge.

If you have any questions about MDA's comments, or would like additional information about local food production, please feel free to contact me.

Sincerely,



Michael Zastoupil

Agricultural and Food Systems Planner

Energy and Environment Section

Ag Marketing & Development Division

651-201-6369

michael.zastoupil@state.mn.us

cc: Stephen Roos, Environmental Planner

Minnesota Department of Natural Resources
Northeast Regional Headquarters
1201 East Highway 2, Grand Rapids, MN 55744

December 22, 2025

Jenn Moses, AICP
Planning Manager
Planning and Development Division
411 W. 1st Street, Room 160
Duluth, MN 55802
(218) 730-5328
jmoses@duluthmn.gov

RE: Downtown Duluth Scoping Environmental Assessment Worksheet (EAW) for forthcoming Draft Alternative Urban Areawide Review (AUAR).

Dear Ms. Moses,

The Minnesota Department of Natural Resources (MNDNR) has conducted a review of the **Downtown Duluth Scoping EAW for the forthcoming Draft AUAR**. We appreciate the opportunity to review this project and encourage project proposers to continue their coordination with MN DNR and other agencies to protect natural resources and recreational opportunities.

Lot D Development

The Lot D development is adjacent to the Duluth Harbor which is a public water. Activities below the ordinary high-water level (OHWL) of public waters are regulated by DNR via the public waters work permit program. This permit is administered by MNDNR Area Hydrologist Bri Speldrich (Bri.Speldrich@state.mn.us).

The loss of public waters is of concern with the proposed Lot D concept plan (page 90). The Saint Louis River Estuary (SLRE) is identified as a lake of outstanding biological significance. Minimizing impacts to this important waterway is important to the fishery and other wildlife that depend on this ecosystem.

Section 10, page 18 of the scoping AUAR states: *“It is anticipated that repair and replacement of the existing seawall would include reclamation of a portion of the land that has eroded and replacement of the dock wall around the entire property.”* Public waters rules state that fill may not exceed more than a minimum encroachment, change, or damage to the environment. Minnesota Rule 6115.0190 Subpart 3B states that placement of fill within public waters strictly to create upland is prohibited. Minnesota Rule 6115.0191 Subpart 4 includes requirements for reclaiming shoreline lost to erosion. Typically, no more than 400 square feet may be reclaimed unless the loss of shoreline is a threat to health and safety though the impending loss or damage to existing shoreline development; or the loss occurred because of changes in water levels caused by artificial manipulation not more than 5 years prior. There is no existing shoreline development at risk on Lot D and the shoreline eroded more than 5 years ago. The failed portions of the historic seawall should be considered for removal from the public water as part of the project because they no longer serve public interest, and they could be hazardous to navigation.

The concept plan shows large areas of impervious surface within the shore impact zone in the form of plazas. It would be more appropriate for these areas to be replaced with green space and shoreland buffers. Native shoreline vegetation provides several benefits that impervious surfaces do not including slowing stormwater runoff; absorbing wind/wave energy; filtering nutrients/pollutants; limiting suspended sediments; and providing fish and wildlife habitat. The concept plan also shows an impervious walkway within the shore impact zone around the perimeter of the site. It is not clear if this walkway is for public use. Please clarify if the walkway is intended to be open to public use, or if it is intended as private infrastructure. Additionally, please identify if there are other areas of the site/waterfront that will be accessible by the public.

Because the site is no longer under industrial use and there appears to be no need for direct shoreland docking around the entire perimeter of the site, the shoreline could be re-naturalized. This could include utilizing a soft (native plantings) or hybrid shoreline (native plantings and riprap) design approach rather than reconstructing a seawall. These design approaches could both address shoreline erosion and give the shoreline a more natural appearance consistent with shoreland goals/standards.

The draft AUAR should address how the waterfront will be utilized at the site. This includes anticipated waterfront recreation and watercraft mooring needs. Docks and mooring spaces should be minimized because these structures privatize public space and increase traffic/crowding of surface waters. Excessive amounts of these structures can also be detrimental to fish habitat. Please note, a DNR public waters work permit may be required if certain dock/mooring standards are not met. Please continue close coordination with Bri Speldrich as these plans are developed.

The environmental effects of the following should be disclosed and evaluated further, and may be required for permitting:

- Number and size of mooring spaces anticipated for the site
- Number of mooring spaces that will be utilized by residents/hotel guests and the number that will be utilized by non-residential or non-lodging commercial uses (restaurants, bars, etc.)
- The layout and square footage of docks
- Total maneuvering area needed for watercraft
- Future creation/excavation of new slips
- Water recreation facilities or ancillary services (boat ramps, rentals, saunas, etc.)
- Changes in impervious surface; (with a goal of no net increase).
- Expand upon noxious weed prevention and management plans.
- Expand upon potential for increased traffic and use of nearby parks, trails, and other facilities and identify if additional considerations (such as trail erosion or stream sedimentation) should be mitigated.

In a previous early coordination meeting in which MN DNR staff attended, it was noted that commercial vessels may temporarily moor at this site. There was also discussion of extending the Lakewalk to this site and potentially re-excavating historic Slip 4. These activities are likely to have public water impacts, require additional permitting, and their environmental effects should be addressed in the draft AUAR.

Rare Features

MNDNR Issued a Natural Heritage Review letter, MCE #2025-00850, for this project on December 12, 2025 (see attached). It appears that there are rare features and state-listed species in the vicinity of the project. Please follow all guidance outlined in the Natural Heritage Review Letter.

Thank you for the opportunity to review the **Downtown Duluth Scoping EAW for the forthcoming Draft AUAR**. Due to the proposed shoreland alterations and public water impacts, MNDNR would appreciate the opportunity for additional coordination as project plans progress.

Please contact me with any additional questions. I can be reached at (218) 328-8826 or via email at: jessica.parson@state.mn.us.

Sincerely,



Jessica Parson
Northeast Regional Environmental Assessment Ecologist
Minnesota Department of Natural Resources

CC:
Lisa Joyal
Bri Speldrich
Dan Wilfond
Darrell Schindler
Greg Root
Jessica Parson



Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

December 12, 2025

Erin Sejkora
Stantec

RE: Natural Heritage Review of the proposed **Downtown Duluth AUAR**,
T50N R14W Sections 22, 23, 27, and 34; St. Louis County

Dear Erin Sejkora,

For all correspondence regarding the Natural Heritage Review of this project please include the project ID **MCE-2025-00850** in the email subject line.

As requested, the [Minnesota Natural Heritage Information System](#) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. Based on the project details provided with the request, the following rare features may be impacted by the proposed project:

Ecologically Significant Areas

- Lake Superior has been identified as a Lake of *Outstanding* Biological Significance. Lakes of Biological Significance were ranked as *Outstanding*, *High*, or *Moderate* based on unique plant and animal presence. Many state-listed species are found within Lake Superior, including rare fish and mussels.

There are other natural resource related issues associated with lakeshore developments besides the potential impacts to rare features. These issues include increased nutrients, pollutants, erosion, and sedimentation resulting in decreased water quality and decreased habitat quality for fish and wildlife. Maintaining native vegetation along lakeshores is one way to reduce these negative impacts. The combination of upland, lakeshore, and aquatic plants creates a buffer zone that provides numerous ecological benefits. Lakeshore and upland plants help stabilize banks and protect the shoreline from erosion by absorbing the forces of wind, waves, and boat traffic. They also filter pollutants that would otherwise drain from the watershed into the lake, thereby protecting water quality. Most noticeably, lakeshore and upland plants provide a variety of vital habitat components for fish and wildlife including food, protection from weather and predators, denning sites and nursery areas for young, perching and sunning sites for birds and turtles, and flyways and travel corridors. Aquatic plants produce oxygen, purify lake water by stabilizing bottom sediments and reducing nutrient cycling, and provide underwater cover for fish. As such, if a native vegetation buffer zone is present within the project boundary, we recommend that it be maintained and enhanced. If not, we recommend that one be established.

For additional information on aquatic plants and lakeshore management, please refer to [Natural Shores](#) and [Natural Buffers & Lakescaping](#). The DNR book *Lakescaping for Wildlife and Water Quality* also covers a wide array of topics associated with managing lakeshore property and includes techniques to prevent shoreline erosion and to restore wildlife habitat, wildflowers, and water quality. Another reference is [Restore Your Shore](#), an online interactive multimedia program that guides users through the process of protecting a natural shoreline or restoring a degraded shore with a natural buffer zone.

- Ecologically Significant Areas can be viewed using the Explore page in [Minnesota Conservation Explorer](#) (MCE) or their GIS shapefiles can be downloaded from the [MN Geospatial Commons](#). To receive a list of Ecologically Significant Areas in the vicinity of your project, create a Conservation Planning Report using the Explore page in MCE.

State-listed Species

- [Peregrine falcons](#) (*Falco peregrinus*), a state-listed species of special concern, have been documented nesting on Greysolon Plaza. In urban areas, peregrine falcons nest on tall buildings, bridges, and smokestacks. Peregrine falcons do not make stick nests, instead their nests are scraped flat areas of rock or on a flat building surface. **Provided this structure will not be impacted by the proposed improvements, it is unlikely that the construction activities will affect these birds.** If the birds exhibit unusual behaviors or other signs of potential distress during construction, especially during the breeding season (April through July), please contact the DNR Regional Nongame Specialist, Gaea Crozier (gaea.crozier@state.mn.us).
- The Natural Heritage Information System (NHIS) tracks bat roost trees and hibernacula plus some acoustic data, but this information is not exhaustive. Even if there are no bat records listed nearby, all of Minnesota's bats, including the federally endangered northern long-eared bat ([Myotis septentrionalis](#)), can be found throughout Minnesota. During the active season (approximately April-November) bats roost underneath bark, in cavities, or in crevices of both live and dead trees. Tree removal can negatively impact bats by destroying roosting habitat, especially during the pup rearing season when females are forming maternity roosting colonies and the pups cannot yet fly. To minimize these impacts, **the DNR recommends that tree removal be avoided from June 1 through August 15.**
- Please visit the [DNR Rare Species Guide](#) for more information on the habitat use of state-listed species and recommended measures to avoid or minimize impacts.
- Please report incidental sightings of state-listed species via the [DNR Plant and Animal Observation Form](#).

Federally Protected Species

- To ensure compliance with federal law, conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

Environmental Review and Permitting

- Given the potential presence of state protected species, we encourage submission of Natural Heritage Review requests to ensure avoidance of take for these species and to determine survey needs as individual projects are planned.
- Please include a copy of this letter and the MCE-generated Final Project Report in any state or local license or permit application. Please note that measures to avoid or minimize disturbance to the above rare features may be included as restrictions or conditions in any required permits or licenses.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available and is the most complete source of data on Minnesota's native plant communities, rare species, and other rare features. However, the NHIS is not an exhaustive inventory and does not contain the locations of all rare features in the state. Therefore, ecologically significant features for which we have no records may exist within the project area. If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location and project description provided with the request. **If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating project activities.** Resubmit by selecting *Clone Project as Draft* on the project page in MCE.

The Natural Heritage Review does not constitute project approval by the Department of Natural Resources. Instead, it identifies issues regarding known occurrences of rare features and potential impacts to these rare features. Visit [Natural Heritage Review](#) for additional information regarding this process, survey guidance, and other related information. For information on the environmental review process or other natural resource concerns, please contact your [DNR Regional Environmental Assessment Ecologist](#).

Thank you for consulting us on this matter and for your interest in preserving Minnesota's rare natural resources.

Sincerely,

Molly Barrett

Digitally signed by Molly Barrett
Date: 2025.12.12 18:30:00 -06'00'

Natural Heritage Review Specialist

molly.barrett@state.mn.us

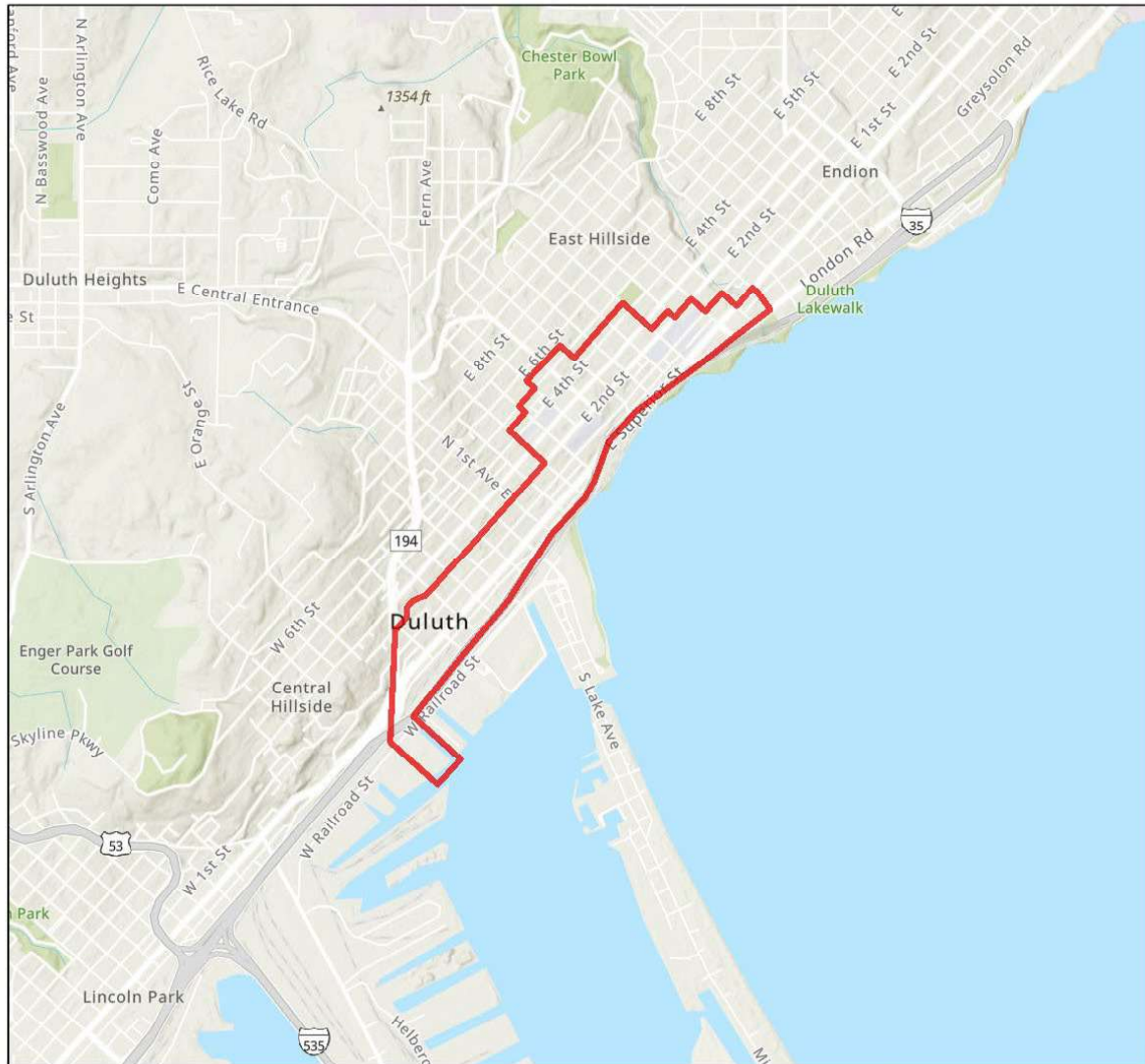
Cc: [Jessica Parson](#), Regional Environmental Assessment Ecologist, Northeast (Region 2)

Cc: [Sophia Musiak](#), Assistant Regional Environmental Assessment Ecologist, Northeast (Region 2)

For more project details, see the MCE-generated Final Project Report, available on the MCE project page.

Downtown Duluth AUAR

USA Topo Basemap With Locator Map



0 0.230.45 0.9 1.35 1.8 Miles

Project Boundary

Project Type: Development, Mixed Use

Project Size (acres): 334.05

County(s): St. Louis

TRS: T50 R14 S22, T50 R14 S23, T50 R14 S27, T50 R14 S34

Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
St. Louis County (MN), MN Dept Natural Resources, Esri, TomTom, Garmin,
SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA,



Sejkora, Erin

From: Jenn Moses <jmoses@DuluthMN.gov>
Sent: Friday, December 26, 2025 2:05 PM
To: Jason Mozol; thobbs@duluthmn.gov; Walburg, Lauren; Sejkora, Erin
Subject: FW: Downtown Duluth AUAR Scoping EAW Comments

Jenn Reed Moses, AICP | Manager | **Planning and Development Division** | City of Duluth | 411 W 1st Street Room 160, Duluth, MN 55802 | 218-730-5328 | jmoses@duluthmn.gov | she/her/hers

From: Webb, Maren (She/Her/Hers) (DOT) <Maren.Webb@state.mn.us>
Sent: Friday, December 26, 2025 2:04 PM
To: Jenn Moses <jmoses@DuluthMN.gov>
Cc: Miles, James (DOT) <james.miles@state.mn.us>; Anderson, Bryan (DOT) <bryan.anderson@state.mn.us>
Subject: Downtown Duluth AUAR Scoping EAW Comments

Dear Ms. Moses,

Thank you for the opportunity to comment on the Downtown Duluth Alternative Urban Areawide Review (AUAR) Scoping EAW document. MnDOT District 1 staff have reviewed the document and have the following comments:

- On page 46, under 20a. Transportation, it is recommended that the new proposed access into the Lot D development is considered with the Traffic Impact Study (TIS).
- On page 46, under 20a. Transportation, please be sure to include data for portion 5): availability of transit and/or other alternative transportation modes.
 - o In relation to alternative transportation modes (walking, biking, etc.) and Lot D, Geno's Walk (BR# 69885, pedestrian bridge over I-35) will be significantly rehabbed Summer 2026. The stairs to Railroad St will be removed under this project, maintaining the ADA accessible connection/ramp.
- On page 33, under Proposed Conditions for stormwater, there is reference to large-scale sediment channels under I-35. It is not clear whether these will be looked at specifically with this process. The document references that they "...were constructed to manage runoff generated from all the public roads, however, these channels also receive runoff that drains down the hillside from 6th Avenue West to 1st Avenue East."

Thank you for your time and please reach out with any questions.

Best,
Maren Webb

Maren Webb, MPP
she/her/hers
Principal Planner | District 1

Minnesota Department of Transportation
1123 Mesaba Avenue
Duluth, MN 55811

218-725-2742
maren.webb@state.mn.us
mndot.gov/



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Downtown Duluth AUAR

Scoping Environmental Assessment Worksheet

Responsible Governmental Unit: City of Duluth
Proposer: City of Duluth



Prepared for:
City of Duluth

November 2025

Prepared by:
Stantec Consulting Services Inc.

Project/File:
227708309

For the purpose of the analyses completed as part of the AUAR, it is assumed the full buildout contemplated in Development Scenario B would occur in the next ten years.

f. **Is this Project a subsequent stage of an earlier Project?** ☐ Yes ☒ No

If yes, briefly describe the past development, timeline and any past environmental review.

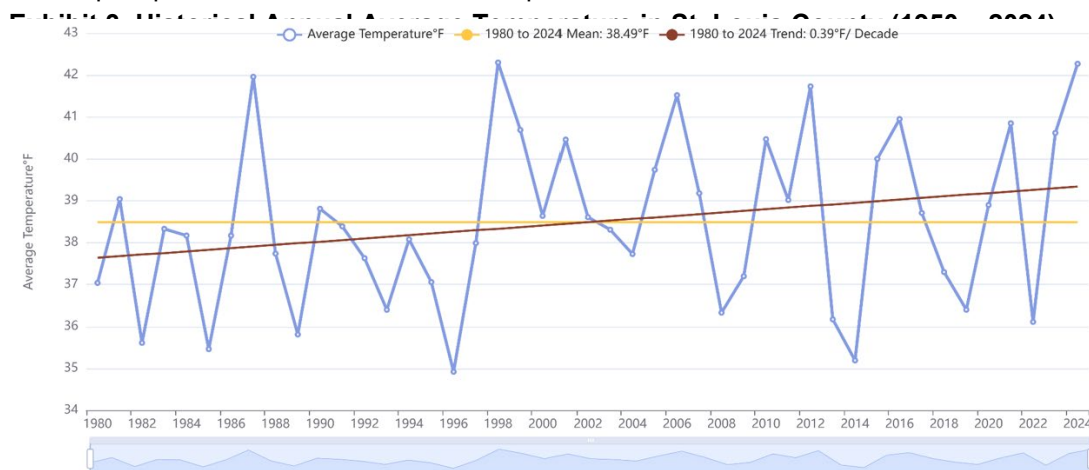
7. Climate Adaptation and Resilience **Where is the reference and guidance from the City's Climate Action Plan?**

a. **Describe the climate trends in the general location of the Project (see guidance: Climate Adaptation and Resilience) and how climate change is anticipated to affect that location during the life of the Project.**

In general, Minnesota is anticipated to experience an increase in temperature, precipitation, and more frequent extreme precipitation events resulting from climate change. In Minnesota, annual average temperatures have risen two degrees over the past century and up to three degrees in the northern part of the state. The highest average temperature increases have occurred during the winter. Since 1895, temperatures during the winter have increased at a rate two to three times higher than during the summer. In particular, winter warming rates have risen more sharply in recent decades.³ Current climate warming trends, most notably during the winter, are anticipated to continue.⁴

Heavy rain events have become more frequent in Minnesota and more intense. From 1973 to 2020, Minnesota experienced 17 mega-rain events⁵ with a notable increase since 2000. Of these 17 events, three occurred in the 1970s, two in the 1980s, one in the 1990s, six mega-rain events occurred in the 2000s, four in the 2010s, and one in 2020. Thus, in the past 21 years (2000 to 2020), almost two times as many mega rain events occurred compared to the prior 27 years (1973 to 1999).⁶

Climate trends in St. Louis County parallel the overall statewide trends, indicating Minnesota's climate is becoming warmer and wetter. Exhibit 3 and Exhibit 4 illustrate historical average annual temperature and annual precipitation trends from 1980 to 2024, respectively. During this time period, the county experienced an average annual temperature increase of 0.39 degrees Fahrenheit (°F) per decade and an annual precipitation increase of 0.10 inches per decade.



Source: DNR Climate Explorer available at <https://climate-explorer.dnr.state.mn.us/main/historical>

³ DNR, undated(a). Climate Trends. Available at: https://www.dnr.state.mn.us/climate/climate_change_info/climate-trends.html. Accessed September 2025.

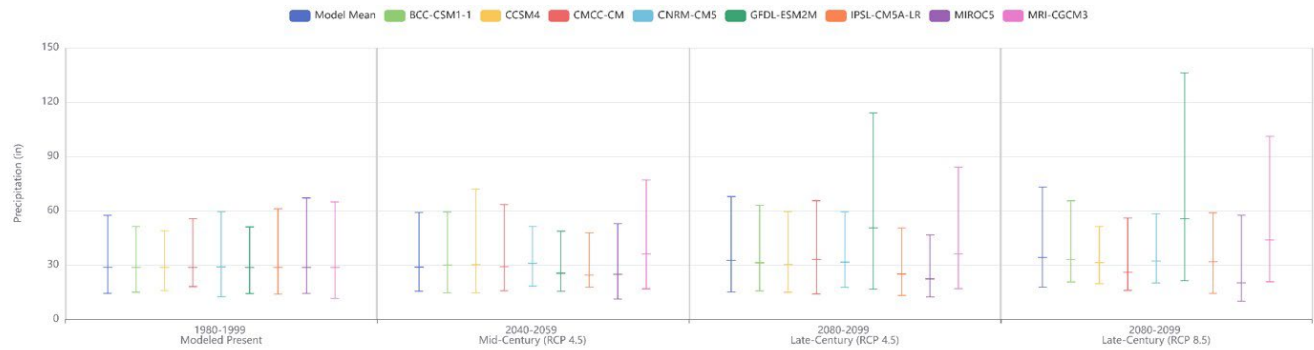
⁴ MnDOT, 2021. Minnesota Go Climate Change Report. Available at: <https://www.minnesotago.org/trends/climate-change>. Accessed September 2025.

⁵ Mega-rain events are defined as events in which six inches of rain covers more than 1,000 square miles and the core of the event tops eight inches. Definition is from the DNR's website cited in footnote 4.

⁶ DNR, 2024(a). Historic Mega-Rain Events in Minnesota. Available at: https://www.dnr.state.mn.us/climate/summaries_and_publications/mega_rain_events.html. Accessed September 2025.

century (2080-2099) model mean of 32.4 inches. Under the RCP 8.5 worst-case scenario, the county would experience a late-century (2080-2099) model mean precipitation of 34.2 inches. In comparison to the modeled present mean (1980-1999), the late-century (2080-2099) modeled mean annual precipitation would increase by approximately 11.8 percent under the RCP 4.5 scenario and increase by approximately 17.1 percent under the RCP 8.5 scenario.

Exhibit 6. Projected Precipitation in St. Louis County



Source: DNR Climate Explorer available at <https://climate-explorer.dnr.state.mn.us/main/historical>

- b. **For each Resource Category in the table below: Describe how the Project's proposed activities and how the Project's design will interact with those climate trends. Describe proposed adaptations to address the Project effects identified.**

Table 2 summarizes climate considerations related to the Project and adaptation considerations.

Table 2. Climate Considerations and Adaptations

Resource Category	Climate Considerations	Project Information	Adaptations
Project Design	Projected climate trends include increasing temperatures, precipitation, and frequency of heavy rainfall events. Minnesota is trending towards warmer temperatures. Urban heat islands occur when impervious surfaces, such as roofs and paved surfaces, absorb heat during the day and release it at night, amplifying the warming trend.	Construction of buildings, parking lots, and other impervious surfaces within the AUAR area may result in minor increases in impervious surface area. Given that the AUAR area consists of a developed, urban environment that is approximately 81 percent impervious, redevelopment would not result in significant increases in impervious surface area compared to existing conditions. Increased impervious surfaces would increase volume of stormwater runoff and potential flooding risk during heavy rain events. Impervious surfaces may create local heat island	Potential adaptations will be identified in the Draft AUAR. Potential adaptations should include, green roofs, heat pumps, solar, tree plantings for shade etc. And they should be required to meet the City's climate action goals.

Resource Category	Climate Considerations	Project Information	Adaptations
		effects by absorbing heat during daytimes hours and radiating it at night leading to an increase in surface temperatures.	
Land Use	Heavier rainfall expected to bring a higher risk of localized flooding. Increased temperatures may create public health crises primarily for vulnerable communities such as children and the elderly.	The majority of the AUAR area currently consists of urban development and limited grasslands and wooded areas. Any conversion from grasslands and wooded areas to more urban development would increase impervious surfaces and may contribute to local heat island effects.	Potential adaptations will be identified in the Draft AUAR and they will reflect the goals of the city's climate action plan
Water Resources	Addressed in Item 12.		
Contamination/ Hazardous Materials/Wastes	The AUAR area is projected to experience an increase in precipitation and heavy rainfall events.	The redevelopment anticipated in the AUAR is not anticipated to involve the installation of chemical/ hazardous materials storage during operation. The Project may include building demolition.	Potential adaptations will be identified in the Draft AUAR. and they will reflect the goals of the city's climate action plan
Fish, wildlife, plant communities, and sensitive ecological resources (rare features)	Addressed in Item 14.		

8. Cover Types

Estimate the acreage of the site with each of the following cover types before and after development.

The majority of the AUAR area (approximately 81 percent) consists of developed, impervious surface areas including buildings, roadways, and parking areas. Limited wooded areas are present within the AUAR area (approximately 0.1 percent) and are primarily characterized as landscape trees and small wooded/vegetated areas adjacent to primarily residential uses. Table 3 and Figure 3, Appendix B summarize cover types within the AUAR area. Table 4 summarizes green infrastructure for each scenario and subarea. Table 5 summarizes tree canopy change information.

AUAR Scope

The cover type analysis will be augmented with aerial photographs and other desktop resources as part of the Draft AUAR. Future land cover for both development scenarios would be evaluated in the Draft AUAR for each subarea. Existing conditions information (Scenario A) is included in the following Tables 3 through 5. These tables would be completed for the maximum development scenario (Scenario B) as part of the Draft AUAR.

Table 3. Cover Types

Cover Types	Scenario A Before (acreage) ¹	Scenario B After (acreage)
Lot D Subarea		
Wetlands and shallow lakes (<2 meters deep)	0.0 (0.0%)	Future land cover for Scenario B to be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and natural resources mgmt program plan
Deep lakes (>2 meters deep)	4.6 (24.8%)	
Wooded/forest	0.5 (2.7%)	
Brush/grassland	0.0 (0.0%)	
Cropland	0.0 (0.0%)	
Lawn/landscaping	5.0 (26.9%)	
Green infrastructure total (from table below*)	0.4 (1.9%)	
Impervious surface	8.1 (43.7%)	
Stormwater basins	0.0 (0.0%)	
Subarea Total	18.6	
Essentia Subarea		
Wetlands and shallow lakes (<2 meters deep)	0.0 (0.0%)	Future land cover for Scenario B to be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and natural resources mgmt program plan
Deep lakes (>2 meters deep)	0.0 (0.0%)	
Wooded/forest	7.6 (9.1%)	
Brush/grassland	0.0 (0.0%)	
Cropland	0.0 (0.0%)	
Lawn/landscaping	5.2 (6.3%)	
Green infrastructure total (from table below*)	0.0 (0.0%)	
Impervious surface	70.1 (84.6%)	
Stormwater basins	0.0 (0.0%)	
Subarea Total	82.9	
1st Street Subarea		
Wetlands and shallow lakes (<2 meters deep)	0.7 (0.5%)	Future land cover for Scenario B to be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and stormwater mgmt plan
Deep lakes (>2 meters deep)	0.0 (0.0%)	
Wooded/forest	8.8 (6.2%)	
Brush/grassland	0.0 (0.0%)	
Cropland	0.0 (0.0%)	
Lawn/landscaping	8.8 (6.2%)	
Green infrastructure total (from table below*)	0.0 (0.0%)	
Impervious surface	123.1 (87.1%)	
Stormwater basins	0.0 (0.0%)	
Subarea Total	141.4	
Secondary Subarea		
Wetlands and shallow lakes (<2 meters deep)	0.0 (0.0%)	Future land cover for Scenario B to be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and stormwater mgmt plan
Deep lakes (>2 meters deep)	0.0 (0.0%)	
Wooded/forest	12.6 (13.7%)	
Brush/grassland	0.0 (0.0%)	
Cropland	0.0 (0.0%)	
Lawn/landscaping	11.1 (12.1%)	
Green infrastructure total (from table below*)	0.0 (0.0%)	

Cover Types	Scenario A Before (acreage) ¹	Scenario B After (acreage)
Impervious surface	68.0 (74.2%)	
Stormwater basins	0.0 (0.0%)	
Subarea Total	91.7	
Total AUAR area		
Wetlands and shallow lakes (<2 meters deep)	0.7 (0.2%)	Future land cover for Scenario B to be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and stormwater mgmt plan
Deep lakes (>2 meters deep)	4.6(1.4%)	
Wooded/forest	29.4 (8.8%)	
Brush/grassland	0.0 (0.0%)	
Cropland	0.0 (0.0%)	
Lawn/landscaping	30.1 (9.0%)	
Green infrastructure total (from table below*)	0.4 (0.1%)	
Impervious surface	269.3 (80.5%)	
Stormwater basins	0.0 (0.0%)	
AUAR Area Total	334.5	

¹ Before acreages are approximate and based on Duluth 1-Meter Land Cover 2016.

Table 4. Green Infrastructure

Green Infrastructure	Before (acres)	After
Lot D Subarea		
Constructed infiltration systems (infiltration basins/infiltration trenches/ rainwater gardens/bioretention areas without underdrains/swales with impermeable check dams)	0	Future green infrastructure will be evaluated in the Draft AUAR. and support goals of the city's comp plan, climate plan, parks plan and stormwater mgmt plan
Constructed tree trenches and tree boxes	0	
Constructed wetlands	0	
Constructed green roofs	0	
Constructed permeable pavements	0	
Other (describe):	0	
Subarea Total	0	
Essentia Subarea		
Constructed infiltration systems (infiltration basins/infiltration trenches/ rainwater gardens/bioretention areas without underdrains/swales with impermeable check dams)	0	Future green infrastructure will be evaluated in the Draft AUAR.
Constructed tree trenches and tree boxes	0	
Constructed wetlands	0	
Constructed green roofs	0.5*	
Constructed permeable pavements	0	
Other (describe):	0	
Subarea Total	0	
1st Street Subarea		

area (1st Street subarea). The area to the northeast is also within the AUAR area (Secondary subarea). Areas uphill of the Essentia subarea generally consist of lower density housing. Lake Superior is downhill (to the east) from the Essentia Subarea. The Superior Street Boulevard connects over I-35 in this subarea with the Lakewalk along Lake Superior. The North Shore Scenic Drive also intersects this subarea. No cemeteries or prime or unique farmlands are within the subarea.

1st Street Subarea

The 1st Street subarea includes Duluth's historic downtown core, including a mix of office, commercial, hospitality uses, and high density housing. Several surface and structure parking lots are also present within this subarea, along with a limited amount of light industrial uses. Many historic buildings are located within the 1st Street subarea, which are described further in Item 15 of this AUAR. Parks and open spaces within this subarea include Civic Center, Ordean Court, Gateway Park, Rail Park, Minnesota Power Plaza and Lake Superior Plaza. The North Shore Scenic Drive also extends through this subarea. A spur of the Cross City Trail connects through the 1st Street subarea. No cemeteries or prime or unique farmlands are within the subarea.

Secondary Subarea

Existing land uses in the Secondary subarea include high, medium, and low density housing, the Aspirus St. Lukes Hospital campus, and a mix of commercial uses mostly located along Superior Street. Land use in the southwest portion of the subarea generally coincides with the Essentia subarea described above and uses to the north are mostly residential. Lake Superior is generally to the east. The Lakewalk, Leif Erikson Park and the Rose Gardens are adjacent to the subarea. No cemeteries or prime or unique farmlands are within the subarea.

- ii. *Plans. Describe planned land use as identified in comprehensive plan (if available) and any other applicable plan for land use, water, or resources management by a local, regional, state, or federal agency.***

AUAR Scope

Several plans will be reviewed and summarized in the Draft AUAR. These plans include:

- Imagine Duluth 2035 (City's Comprehensive Plan)
- Essential Spaces – Duluth Parks, Recreation, Open Space & Trails Plan
- Duluth Parks and Recreation Master Plan
- Duluth Trail and Bikeway Plan
- 2023 Downtown Housing Study
- 2025 Duluth Housing Needs Analysis (city-wide)
- Vision Northland Master Plan
- Duluth Market Study (Cushman Wakefield)
- Lot D – Minnesota Finance Plan
- The St. Louis River Area of Concern Plan, Duluth Natural Resources Mgmt Program Plan, Duluth Stormwater Plan and Duluth Climate Action Plan

- iii. *Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.***

AUAR Scope

Lot D Subarea

Lot D is zoned MU-W Mixed Use Waterfront. A large portion of the Lot D subarea is also within the City's shoreland overlay zone associated with the Duluth/Superior Harbor Shoreline. Zoning surrounding this subarea includes industrial to the southwest and west, and MU-W to the northeast. These zoning districts will be described further in the AUAR and the maximum development scenario will be reviewed for potential incompatibilities with the districts and overlay. Figure 6, Appendix B

standard), designated in June 1994.²⁷

AUAR Scope

The Draft AUAR will include a qualitative vehicle emissions assessment conducted in accordance with MnDOT air quality analysis guidance.²⁸ It is not anticipated that a quantitative air quality analysis for CO or MSATs would be required. *There is opportunity to consider reduced traffic in areas to not only increase walker/biker/diability and DTA services, but to reduce emissions and noise in some corridors*

- c. *Dust and odors - Describe sources, characteristics, duration, quantities, and intensity of dust and odors generated during Project construction and operation. (Fugitive dust may be discussed under item 17a). Discuss the effect of dust and odors in the vicinity of the Project including nearby sensitive receptors and quality of life. Identify measures that will be taken to minimize or mitigate the effects of dust and odors.***

AUAR Scope

Dust and odors may be of concern during construction of future development projects. The Draft AUAR will document city ordinances and codes pertaining to dust and odors and identify sensitive receptors in the vicinity of the AUAR area. Minimization and mitigation strategies for the AUAR area will be developed.

18. Greenhouse Gas (GHG) Emissions/Carbon Footprint

- a. *GHG Quantification: For all proposed Projects, provide quantification and discussion of Project GHG emissions. Include additional rows in the tables as necessary to provide Project-specific emission sources. Describe the methods used to quantify emissions. If calculation methods are not readily available to quantify GHG emissions for a source, describe the process used to come to that conclusion and any GHG emission sources not included in the total calculation.***

AUAR Scope

The Minnesota Environmental Quality Board's (EQB's) EAW climate adaptation and resilience guidance (June 2024)²⁹ *and the City's Climate Action Plan* will be used to develop the carbon footprint for the Draft AUAR. Greenhouse gas emissions will be calculated for existing conditions (baseline, development Scenario A) and the construction and operation of Development Scenario B. Land use changes will also be included in the greenhouse gas quantification.

Readily available emission calculation tools such as U.S. EPA's Simplified Greenhouse Gas Emissions Calculator (SGEC) Tool or other acceptable methods would be used for the calculations. The SGEC Tool uses building square footage to estimate natural gas and electricity usage for various building types. Construction emissions would be calculated for each development scenario based on the number and type of mobile equipment needed. Greenhouse gas emissions from the equipment exhaust would be calculated using U.S. EPA emission factors.

Summary tables will be provided for the development scenarios, summarizing construction and operation emissions.

- b. *GHG Assessment***

- i. *Describe any mitigation considered to reduce the Project's GHG emissions.***

²⁷Environmental Protection Agency. EPA Green Book. Updated August 2025. Available at: https://www3.epa.gov/airquality/greenbook/anayo_mn.html. Accessed September 2025.

²⁸ MnDOT. Air Quality Process. <http://www.dot.state.mn.us/project-development/subject-guidance/air-quality/process.html>. Accessed September 2025.

²⁹ EQB. Environmental Assessment Worksheet (EAW) Guidance. June 2024 https://www.eqb.state.mn.us/sites/eqb/files/2024_eaw_climate_guidance_2.pdf. Accessed September 2025.

AUAR Scope

Reductions in greenhouse gas emissions associated with Development Scenario B compared to the baseline Development Scenario A will be described in the Draft AUAR. Potential mitigation measures will be identified, such as energy efficient lighting or other building efficiency specifications, **renewable energy, heat pumps**. Specific mitigation measures would be identified at the time that specific projects are proposed within the AUAR.

- ii. ***Describe and quantify reductions from selected mitigation, if proposed to reduce the Project's GHG emissions. Explain why the selected mitigation was preferred.***

AUAR Scope

Potential opportunities for GHG emissions reductions will be qualitatively evaluated as part of the Draft AUAR. At the time that specific projects are proposed within the AUAR and design details are available, potential GHG emissions reductions may be quantified.

- iii. ***Quantify the proposed Projects predicted net lifetime GHG emissions (total tons/# of years) and how those predicted emissions may affect achievement of the Minnesota Next Generation Energy Act goals and/or other more stringent state or local GHG reduction goals.***

AUAR Scope

The net lifetime greenhouse gas emissions will be presented for development scenarios, along with a discussion of how the scenarios affect the state's **and the city's** greenhouse gas reduction goals.

19. Noise

Describe sources, characteristics, duration, quantities, and intensity of noise generated during Project construction and operation. Discuss the effect of noise in the vicinity of the Project including 1) existing noise levels/sources in the area, 2) nearby sensitive receptors, 3) conformance to state noise standards, and 4) quality of life. Identify measures that will be taken to minimize or mitigate the effects of noise.

In accordance with the EQB's AUAR guidance document³⁰, it is not required to address construction noise unless there is some unusual reason to do so. No unusual circumstances are anticipated for the development scenarios that would warrant conducting a quantitative noise analysis.

The State of Minnesota's noise rules (Minn. Rules Ch. 7030) establish noise limits by noise area classifications (NACs) based on land use at the location of the person that hears noise. The MPCA enforces noise standards at industrial facilities for which it has issued an air permit. MnDOT is responsible for state highway noise mitigation and coordinates with the Federal Highway Administration (FHWA) and the MPCA to evaluate road projects for noise impacts and possible mitigation measures.

Noise impacts in Minnesota are evaluated by measuring and/or modeling the noise levels that are exceeded 10 percent and 50 percent of the time during the hours of the day and/or night that have the loudest scenario. These numbers are identified as the L10 and L50 levels, respectively. The L10 value is the noise level that is exceeded for a total of 10 percent, or six minutes, of an hour. The L50 value is the noise level that is exceeded for a total of 50 percent, or 30 minutes, of an hour.

For traffic noise analyses, traffic volume, types of vehicles, operating speed, topography, and distance from the road to the receptor influences the traffic noise level at the receptor. The sound level decreases as distance from a source increases. A general rule regarding sound level decrease due to increasing distance from a line source (roadway) that is commonly used is: beyond approximately 50 feet from the sound source, each doubling of distance from the line source over hard ground (such as pavement or water) will reduce the

³⁰ EQB. Alternative Urban Area-wide Review Documents: Recommended Content and Format. Updated September 2008. <https://www.eqb.state.mn.us/sites/default/files/documents/AUAR%20guidance%20%28form%29%20-9-09.pdf>

3) Conformance to State noise standards

Minnesota's noise pollution rules³¹ are based on statistical measurements that describe noise levels over a one-hour monitoring period. Two key values are used: L₁₀, the sound level exceeded 10 percent of the time (equivalent to six minutes per hour), and L₅₀ the sound level exceeded 50 percent of the time (30 minutes per hour). The rules do not establish an absolute maximum noise level.

For residential locations (Noise Area Classification 1), the daytime limits (7:00 a.m. – 10:00 p.m.) are 65 dBA for L₁₀ and 60 dBA for L₅₀ while the nighttime limits (10:00 p.m. – 7:00 a.m.) are 55 dBA for L₁₀ and 50 dBA for L₅₀. In practice, this means that during a one-hour period, daytime noise levels cannot exceed 65 dBA for more than 10 percent of the time or 60 dBA for more than 50 percent of the time. Table 12 provides a summary of the Noise Area Classifications and associated standards. **Please add issues related to long term lower level dBA and vibrations especially next to residential areas. These issues can greatly impact human health as well.**

NAC	Common land use associated with the Noise Area Classification	Daytime (dBA)		Nighttime (dBA)	
		L ₁₀	L ₅₀	L ₁₀	L ₅₀
1	Residential housing, religious activities, camping and picnicking areas, health services, hotels, educational services	65	60	55	50
2	Retail, business and government services, recreational activities, transit passenger terminals	70	65	70	65
3	Manufacturing, fairgrounds and amusement parks, agricultural and forestry activities	80	75	80	75

NACs are determined by the land use at the location where the noise is received, which does not always correspond to the zoning designation of the area. As a result, noise generated by an industrial facility adjacent to residential properties is subject to NAC 1 standards if it can be heard on those residential parcels.

By state law, all future development within the AUAR area must comply with Minnesota's noise standards. In addition, future land uses must comply with local noise requirements under Duluth's Legislative Code, which incorporates the City's ordinances. **Please address issues beyond law compliance related to research from long term lower level dBA and vibrations especially next to residential areas. These issues can greatly impact human health as well as residents on east coast are noticing with increase of data centers.**

AUAR Scope

Area-specific evaluations in the Draft AUAR will assess whether operational noise from maximum development could approach NAC limits. Where necessary, design strategies (setbacks, orientation, landscaping) or operational measures will be identified to maintain compliance.

4) Quality of Life

Maximum development would likely increase background noise levels. However, these changes are anticipated to remain consistent with those of a typical urban environment. Quality of life considerations would focus on residential livability in adjacent hillside neighborhoods, lodging and residential uses in Canal Park, the sensitivity of medical campus operations within the Essentia Health Medical Campus, and recreational use of the waterfront and Lakewalk.

AUAR Scope

The Draft AUAR will evaluate the potential quality of life impacts resulting from operational noise generated by the development scenarios. Mitigation strategies will be identified as applicable.

³¹ More information on Minnesota Noise rules, [Minn. Rules Ch. 7030](https://www.pca.state.mn.us/sites/default/files/p-gen6-01.pdf), may be found at: <https://www.pca.state.mn.us/sites/default/files/p-gen6-01.pdf>

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
Lot D Subarea (2 Resources)			
SL-DUL-00056	Huron-Portland Cement	Building	8th Ave. W. and waterfront
SL-DUL-02441	U.S. Coast Guard Cutter Sundew	Structure (Boat)	Waterfront (No address)
Essentia Subarea (134 Resources)			
SL-DUL-04120	Bridge 69817	Transportation, Road-Related (Vehicular)	Michigan Street and I-35 Interchange
SL-DUL-00212	Mutual Auto Company-Bresnan Communications	Commerce/Trade, Specialty Store	302 Superior St. E.
SL-DUL-00213	Burrell and Harmon Metal Work	Commerce/Trade, Specialty Store	308 Superior St. E.
SL-DUL-00214	Hotel Florham	Commerce/Trade, Specialty Store	310-312 Superior St. E.
SL-DUL-00215	Northwest Cadillac Company	Commerce/Trade, Specialty Store	314 Superior St. E.
SL-DUL-00180	Commercial building	Commerce/Trade, Specialty Store	309-317 Superior St. E.
SL-DUL-00216	McNamara Automobiles	Commerce/Trade, Specialty Store	318 Superior St. E.
SL-DUL-00217	Buffalo Saloon	Commerce/Trade, Specialty Store	320 Superior St. E.
SL-DUL-00815	Monte Carlo Apartments	Domestic, Multiple Dwelling	324-326 E. Superior St.
SL-DUL-00814	Commercial building	Commerce/Trade, Specialty Store	322 Superior St. E.
SL-DUL-00181	Carlson Bakery	Commerce/Trade, Specialty Store	319 Superior St. E.
SL-DUL-00182	Vacant lot - Paul Bunyan Printing	Commerce/Trade, Specialty Store	321 Superior St. E.
SL-DUL-00183	Parker Millinery	Commerce/Trade, Specialty Store	323 Superior St. E.
SL-DUL-00184	The Voyageur Motel	Domestic, Hotel	331 Superior St. E.
SL-DUL-00817	Mathhiason Tire Company	Commerce/Trade, Specialty Store	400 Superior St. E.
SL-DUL-00819	Kenzen Used Cars	Commerce/Trade, Specialty Store	410 Superior St. E.
SL-DUL-00821	Branch's Hall	Commerce/Trade, Specialty Store	416 Superior St. E.
SL-DUL-00822	Kenzen Auto Sales	Commerce/Trade, Specialty Store	430 Superior St. E.
SL-DUL-00116	House	Domestic, Single Dwelling	311 1st St. E.
SL-DUL-00818	Dodge Block	Commerce/Trade, Specialty Store	401-407 Superior St. E.
SL-DUL-00115	brownstone apartments	Domestic, Multiple Dwelling	309 1/2 1st St. E.
SL-DUL-00117	Duplex	Domestic, Multiple Dwelling	315 1st St. E.
SL-DUL-00118	Duplex	Domestic, Multiple Dwelling	317 1st St. E.
SL-DUL-00244	Harbor View Apartments	Domestic, Multiple Dwelling	17-19 North 4th Ave. E.
SL-DUL-00119	New York apartments	Domestic, Multiple Dwelling	319-321 1st St. E.
SL-DUL-00121	Duplex	Domestic, Multiple Dwelling	323 1st St. E.
SL-DUL-01075	Kellerhais Auto Body	Domestic, Secondary Structure	402 1st St. E.
SL-DUL-00122	House	Domestic, Single Dwelling	325 1st St. E.
SL-DUL-00245	Harbor View Apartments	Domestic, Multiple Dwelling	21-23 North 4th Ave. E.
SL-DUL-00820	Arrowhead Glass Company	Commerce/Trade, Specialty Store	415 Superior St. E.
SL-DUL-00246	Harbor View Apartments	Domestic, Multiple Dwelling	25-27 North 4th Ave. E.
SL-DUL-00088	First Presbyterian Church	Religion, Religious Facility	302 2nd St. E.
SL-DUL-00089	Portland Apartments	Domestic, Multiple Dwelling	316 2nd St. E.
SL-DUL-00123	House	Domestic, Single Dwelling	331 1st St. E.
SL-DUL-01077	Duplex	Domestic, Multiple Dwelling	408-410 1st St. E.
SL-DUL-01076	House	Domestic, Single Dwelling	406 1st St. E.
SL-DUL-00247	Harbor View Apartments	Domestic, Multiple Dwelling	29-31 North 4th Ave. E.
SL-DUL-00248	Harbor View Apartments	Domestic, Multiple Dwelling	33-35 North 4th Ave. E.
SL-DUL-01079	Berkely Apartments	Domestic, Multiple Dwelling	416-420 1st St. E.
SL-DUL-00090	house-Almquist insurance	Domestic, Single Dwelling	320 2nd St. E.
SL-DUL-01078	Warehouse	Commerce/Trade, Warehouse	412 1st St. E.
SL-DUL-00249	House	Domestic, Single Dwelling	109 North 4th Ave. E.
SL-DUL-01266	Grandview Manor	Domestic, Multiple Dwelling	301 2nd St. E.
SL-DUL-01080	House	Domestic, Single Dwelling	422 1st St. E.
SL-DUL-01081	House	Domestic, Single Dwelling	424 1st St. E.
SL-DUL-00091	House	Domestic, Single Dwelling	322 2nd St. E.
SL-DUL-01082	Duluth Auto Body	Domestic, Secondary Structure	426-428 1st St. E.
SL-DUL-00092	Miller-Dawn Medical	Health Care, Medical Business/Office	330 2nd St. E.
SL-DUL-02813	Temple Adas Israel Synagogue	Religion, Religious Facility	302 E 3RD ST
SL-DUL-03942	Bridge 69821 (Brewery Historic District Tunnel/ Superior West Tunnel)	Transportation, Road-Related (Vehicular)	I-35 between 4th and 6th Avenues East
SL-DUL-01419	Apartments	Domestic, Multiple Dwelling	301-307 3rd St. E.
SL-DUL-01422	St. Anne's Home	Domestic, Multiple Dwelling	330 3rd St. E.
SL-DUL-01268	House	Domestic, Single Dwelling	420 2nd St. E.
SL-DUL-01420	Apartments	Domestic, Multiple Dwelling	317 3rd St. E.
SL-DUL-01592	Messiah Lutheran Church	Religion, Religious Facility	4th St. and 3rd Ave. E.
SL-DUL-01074	Commercial building	Commerce/Trade, Specialty Store	401 1st St. E.
SL-DUL-01267	Shoreview Apartments	Domestic, Multiple Dwelling	401 2nd St. E.
SL-DUL-01083	Hampshire Apartments	Domestic, Multiple Dwelling	514-518 1st St. E.
SL-DUL-02815	Essentia Health-Duluth Clinic 3rd Street Building & Parking Ramp	Health Care, Clinic	400 E 3RD ST

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-02814	St. Mary Star of the Sea Catholic Church (St. Mary's Polish Catholic Church)	Religion, Religious Facility	325 E 3RD ST
SL-DUL-03751	Essentia Health	Health Care	400 3rd St E
SL-DUL-02008	House	Domestic, Single Dwelling	329 North 4th Ave. E.
SL-DUL-01593	Jeffrey Black Building	Commerce/Trade, Specialty Store	332 4th St. E.
SL-DUL-03746	Commercial building	Commerce/Trade, Specialty Store	532 1st St E
SL-DUL-01084	Peerless Auto Body	Domestic, Secondary Structure	532 1st St. E.
SL-DUL-01270	Miller-Dawn Hospital	Health Care, Hospital	504 2nd St. E.
SL-DUL-02816	St. Mary's Hospital	Health Care, Hospital	407 E 3RD ST
SL-DUL-01269	House	Domestic, Single Dwelling	501 2nd St. E.
SL-DUL-02817	Kaarbos Auto Repair	Commerce	331 4th Street East
SL-DUL-01594	Commercial building	Commerce/Trade, Specialty Store	401 4th St. E.
SL-DUL-03750	Unknown	-	620 1st St E
SL-DUL-01085	Apartment	Domestic, Multiple Dwelling	601-603 E 1st St
SL-DUL-01087	House	Domestic, Single Dwelling	610 1st St. E.
SL-DUL-01088	Commercial Building	Commerce/Trade, Specialty Store	614 E 1st St
SL-DUL-03679	Apartment	Domestic, Multiple Dwelling	605 E 1st St
SL-DUL-01425	Ashtabula Apartments	Domestic, Multiple Dwelling	502 3rd St. E.
SL-DUL-03747	Duplex	Domestic, Multiple Dwelling	601-603 1st St E
SL-DUL-03748	Duplex	Domestic, Multiple Dwelling	605 1st St E
SL-DUL-03749	Duplex	Domestic, Multiple Dwelling	607-609 1st St E
SL-DUL-01086	Apartments	Domestic, Multiple Dwelling	607-609 E 1st St
SL-DUL-01595	Commercial building	Commerce/Trade, Specialty Store	407 4th St. E.
SL-DUL-01271	House	Domestic, Single Dwelling	517 2nd St. E.
SL-DUL-01868	Apartments	Domestic, Multiple Dwelling	110-114 N 6th Ave E
SL-DUL-02818	Goering Bldg.	-	413 4th Street East
SL-DUL-01092	Expert Tire (Commercial Building)	Commerce/Trade, Specialty Store	624 E 1st St
SL-DUL-02819	Beschenbossel Building	-	415 4th Street East
SL-DUL-01272	Daugherty Funeral Home	Funerary, Mortuary	600 2nd St. E.
SL-DUL-01089	House	Domestic, Multiple Dwelling	619 E 1st St
SL-DUL-01427	Johnson Mortuary	Funerary, Mortuary	514 3rd St. E.
SL-DUL-01704	Evergreen Apartments	Domestic, Multiple Dwelling	402-404 5th St. E.
SL-DUL-01091	Double House	Domestic, Multiple Dwelling	621-623 E 1st St
SL-DUL-01090	House	Domestic, Single Dwelling	621 1st St. E.
SL-DUL-01596	The Barber	Commerce/Trade, Specialty Store	419 4th St. E.
SL-DUL-04087	Commercial Building	Commerce/Trade, Business	421 East 4th Street
SL-DUL-01007	Vermillion Trail Marker	-	Washington Ave. & 1st St.
SL-DUL-01093	Double House	Domestic, Multiple Dwelling	629 E 1st St
SL-DUL-01873	House	Domestic, Single Dwelling	119 North 7th Ave. E.
SL-DUL-01870	Gloria Dei Church	Religion, Religious Facility	219 North 6th Ave. E.
SL-DUL-03617	Swedish Evangelical Lutheran Church	Religion, Religious Facility	219 N. 6th Ave. E.
SL-DUL-01426	Fifth Avenue Apartments	Domestic, Multiple Dwelling	503 3rd St. E.
SL-DUL-02820	Bell Apartment	Domestic, Multiple Dwelling	502 E 4th St.
SL-DUL-01274	House (parish center)	Religion, Religious Facility	620 E 2nd St
SL-DUL-02838	Commercial building	Commerce/Trade, Specialty Store	512-514 4th St E
SL-DUL-01273	House	Domestic, Single Dwelling	617 2nd St. E.
SL-DUL-02822	Daugherty Bldg.	Commerce/Trade, Specialty Store	516 E 4th St.
SL-DUL-01279	Twelve Holy Apostles Greek Orthodox Church	Religion, Religious Facility	632 E 2nd St
SL-DUL-02836	Bartholdi Block	Commerce/Trade, Specialty Store	501 4th Street East
SL-DUL-03614	SMDC Health System building	-	412 N. 5th Ave. E.
SL-DUL-03615	Commercial Building	Commerce	520 E. 4th St.
SL-DUL-01275	House	Domestic, Single Dwelling	621 E 2nd St
SL-DUL-01277	House	Domestic, Single Dwelling	629 2nd St. E.
SL-DUL-01278	House	Domestic, Single Dwelling	631 2nd St. E.
SL-DUL-03616	Commercial Building	Commerce	526 E. 4th St.
SL-DUL-02823	Potswald Block	Commerce/Trade, Specialty Store	522 E 4th St.
SL-DUL-02821	Tufia Bldg.	Commerce/Trade, Specialty Store	513 E 4th St.
SL-DUL-01276	House	Domestic, Single Dwelling	627 2nd St. E.
SL-DUL-01429	Kohagen Flats	Domestic, Multiple Dwelling	632 E 3rd St
SL-DUL-03602	Grocery Store	Commerce	610 E. 4th St.
SL-DUL-01428	Schaf Flats	Domestic, Multiple Dwelling	631 3rd St. E.
SL-DUL-03601	Commercial Building and Gas Station	Commerce	619 E. 4th St.
SL-DUL-03613	Auto Repair - Retail Store	Commerce	531 E. 5th St.
SL-DUL-03618	Brewery Creek Culvert	Transportation, Road-Related (Vehicular)	unknown
SL-DUL-01709	House	Domestic, Single Dwelling	618 5th St. E.
SL-DUL-03693	Brooks Terrace	Domestic, Multiple Dwelling	621 E 4th St

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-03612	Automotive Parts Headquarters Inc.	Commerce	502 N. 6th Ave. E.
SL-DUL-03611	House	Domestic	609 E. 5th St.
SL-DUL-01711	House	Domestic, Single Dwelling	620 5th St. E.
SL-DUL-01712	Krause Building	Domestic, Multiple Dwelling	624-626 E 5th St
SL-DUL-03610	2 Houses	Domestic, Multiple Dwelling	613 E. 5th St.
SL-DUL-01708	Duplex	Domestic, Multiple Dwelling	617 E 5th St
SL-DUL-01710	Duplex	Domestic, Multiple Dwelling	619 E 5th St
SL-DUL-03609	House	Domestic	623 E. 5th St.
SL-DUL-03608	House	Domestic	627 E. 5th St.
SL-DUL-03607	House	Domestic	629 E. 5th St.
1st Street Subarea (249 Resources)			
SL-DUL-04109	Bridge 69818S	Transportation, Road-Related (Vehicular)	I-35 between Mesaba Avenue and 5th Avenue West
SL-DUL-03038	Bridge 69840	Transportation, Road-Related (Vehicular)	0.2 MI N OF JCT TH 35 (carries MN 194 NB over SUPERIOR ST(MSAS171))
SL-DUL-00959	Bible House Building	Commerce/Trade, Business	715 Superior St. W.
SL-DUL-00958	Lenox Place	Domestic, Multiple Dwelling	701 Superior St. W.
SL-DUL-04107	Bridge 69818B	Transportation, Road-Related (Vehicular)	5th Avenue West and I-35 Interchange
SL-DUL-03115	Gateway Tower	Domestic, Multiple Dwelling	600 Superior St W
SL-DUL-00957	Gateway Towers Apartments	Domestic, Multiple Dwelling	600-612 Superior St. W.
SL-DUL-04110	Bridge 69870A	Transportation, Road-Related (Vehicular)	5th Avenue West and I-35 Interchange
SL-DUL-00658	Duluth Union Depot	Transportation, Rail-Related	506 Michigan St.
SL-DUL-03040	69870	Transportation, Road-Related (Vehicular)	unknown
SL-DUL-04111	Bridge 69870B	Transportation, Road-Related (Vehicular)	5th Avenue West and I-35 Interchange
SL-DUL-02465	William Crooks Locomotive	Transportation, Rail-Related	Duluth Union Depot - 506 Michigan St.
SL-DUL-03113	Parking Structure	Landscape, Parking Lot	N/A Michigan St W
SL-DUL-00955	Radison Duluth Hotel	Domestic, Hotel	505 Superior St. W.
SL-DUL-00953	Ordean Building	Commerce/Trade, Business	424 Superior St. W.
SL-DUL-01240	Gerald W. Heaney Federal Building & US Courthouse/US Custom House/ US Post Office/Civic Center Station	Government, Post Office	515 1st St. W.
SL-DUL-02375	Duplicate Number - See SL-DUL-01240	Government, Government Office	unknown
SL-DUL-00952	Duluth Business University Building	Commerce/Trade, Specialty Store	418 Superior St. W.
SL-DUL-02504	Bridge L6125	Transportation, Road-Related (Vehicular)	Skyway Michigan St. .1 miles east of 5th Ave. W
SL-DUL-00951	Commercial building	Commerce/Trade, Specialty Store	404 Superior St. W.
SL-DUL-01239	Duluth Herald & News Tribune	Commerce/Trade, Business	424 1st St. W.
SL-DUL-00954	KDLH TV	Commerce/Trade, Business	425 Superior St. W.
SL-DUL-00950	Palladis Building	Commerce/Trade, Business	403 Superior St. W.
SL-DUL-00948	Providence Building	Commerce/Trade, Financial Institution	332 Superior St. W.
SL-DUL-01238	Duluth Water & Gas Department Offices	Commerce/Trade, Business	414 1st St. W.
SL-DUL-02373	Soldiers and Sailors Monument	Recreation and Culture, Monument/Marker	unknown
SL-DUL-00947	Medical Arts Building	Health Care, Medical Business/Office	324 Superior St. W.
SL-DUL-00949	Phoenix Building	Commerce/Trade, Specialty Store	333 Superior St. W.
SL-DUL-01236	Duluth Water & Gas Warehouse	Social, Meeting Hall	408-410 1st St. W.
SL-DUL-00943	Torrey Building	Commerce/Trade, Business	314-316 Superior St. W.
SL-DUL-01235	Duluth Athletic Club	Social, Meeting Hall	402 1st St. W.
SL-DUL-02372	St. Louis County Courthouse	Government, Courthouse	unknown
SL-DUL-03953	Bridge 93729 (Skyway)	Transportation, Road-Related (Vehicular)	Skyway Bridge
SL-DUL-00941	Moore Memorial Building	Commerce/Trade, Specialty Store	312 Superior St. W.
SL-DUL-00946	Commercial building	Commerce/Trade, Specialty Store	323 Superior St. W.
SL-DUL-00939	Alworth Building	Commerce/Trade, Specialty Store	306-310 Superior St. W.
SL-DUL-00945	Duluth Common Exchange	Commerce/Trade, Specialty Store	321 Superior St. W.
SL-DUL-00940	Boyce Drug	Commerce/Trade, Specialty Store	306 Superior St. W.
SL-DUL-00944	Black Steer	Commerce/Trade, Restaurant	319 Superior St. W.
SL-DUL-00937	Lonsdale Building	Commerce/Trade, Professional	302 Superior St. W.
SL-DUL-00204	Duluth City Hall	Government, City Hall	132 Superior St. E.
SL-DUL-00942	Bagley & Company	Commerce/Trade, Specialty Store	313-315 Superior St. W.
SL-DUL-01237	Duluth City Hall	Government, City Hall	411 1st St. W.
SL-DUL-01234	J.J. Summers Agency	Commerce/Trade, Specialty Store	322 1st St. W.
SL-DUL-00218	Norwest Bank Building	Commerce/Trade, Financial Institution	230 Superior St. W.
SL-DUL-01233	Northwest Bell Telephone Company	Commerce/Trade, Specialty Store	322 1st St. W.
SL-DUL-02651	Winthrop Building	Commerce/Trade, Specialty Store	325-333 1st St. W
SL-DUL-01230	Commercial building	Commerce/Trade, Specialty Store	314 1st St. W.
SL-DUL-00938	Commercial building	Commerce/Trade, Specialty Store	303-305 Superior St. W.

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-00219	Duluth Hardware Company/Smith, Farwell & Steele Building	Commerce/Trade, Financial Institution	222 Superior St. W.
SL-DUL-00220	The Herald Building	Commerce/Trade, Specialty Store	220 Superior St. W.
SL-DUL-01232	Commercial building	Commerce/Trade, Specialty Store	321-323 1st St. W.
SL-DUL-01228	Duluth YMCA	Recreation and Culture, Sports Facility	302 1st St. W.
SL-DUL-00221	Watterworth & Fee Block	Commerce/Trade, Specialty Store	218 Superior St. W.
SL-DUL-00222	Clague & Prindle Block	Commerce/Trade, Specialty Store	216 Superior St. W.
SL-DUL-01231	Central Garage	Recreation and Culture, Sports Facility	315 1st St. W.
SL-DUL-02770	Duluth Transit Authority (DTA) Transit Center - Skyway Entrance	Government, Government Office	214 Superior St. W.
SL-DUL-00223	Commercial Building (razed)	Commerce/Trade, Specialty Store	214 Superior St. W.
SL-DUL-02771	Ace Hardware	Commerce/Trade, Specialty Store	212 Superior St. W.
SL-DUL-00936	Lyric Block	Commerce/Trade, Specialty Store	209 Superior St. W.
SL-DUL-02772	West Hotel	Domestic, Hotel	210 Superior St. W.
SL-DUL-00225	Commercial building	Commerce/Trade, Specialty Store	208 Superior St. W.
SL-DUL-00224	Commercial building	Commerce/Trade, Specialty Store	210-212 Superior St. W.
SL-DUL-01229	Elk's Club-Court house bldg	Commerce/Trade, Specialty Store	309-311 1st St. W.
SL-DUL-00226	Argone Hotel	Domestic, Hotel	206 Superior St. W.
SL-DUL-01227	Duluth Board of Trade	Commerce/Trade, Business	301-307 1st St. W.
SL-DUL-00227	Sellwood Building	Commerce/Trade, Specialty Store	202 Superior St. W.
SL-DUL-00074	Commercial building	Commerce/Trade, Specialty Store	226-232 1st St. W.
SL-DUL-00073	Commercial building	Commerce/Trade, Specialty Store	222-224 1st St. W.
SL-DUL-02503	Bridge 92849	Transportation, Road-Related (Vehicular)	Skyway Michigan St. E of 3rd Ave W
SL-DUL-00185	First Bank Place	Commerce/Trade, Financial Institution	130 Superior St. W.
SL-DUL-01226	Wolvin Building	Commerce/Trade, Specialty Store	225-231 1st St. W.
SL-DUL-00068	Salvation Army	Commerce	118 North 3rd Ave. W.
SL-DUL-01224	LeTourneau Printing Company	Commerce/Trade, Specialty Store	219-221 1st St. W.
SL-DUL-00186	commercial building-Saw Mill unpainted furniture	Commerce/Trade, Specialty Store	120 Superior St. W.
SL-DUL-01223	Armstead Building	Commerce/Trade, Specialty Store	217 1st St. W.
SL-DUL-00934	Commercial building	Commerce/Trade, Specialty Store	118 Superior St. W.
SL-DUL-00935	First Bank Place	Commerce/Trade, Financial Institution	131 Superior St. W.
SL-DUL-02006	Northwestern Bank of Commerce Drive-In	Commerce/Trade, Financial Institution	23 North 2nd Ave. W.
SL-DUL-00188	Commercial building - Swor Shoes	Commerce/Trade, Specialty Store	114 Superior St. W.
SL-DUL-01221	Central Club Café	Commerce/Trade, Specialty Store	213-215 1st St. W.
SL-DUL-00228	Commercial building	Commerce/Trade, Specialty Store	125-127 Superior St. W.
SL-DUL-00189	F.W. Woolworth	Commerce/Trade, Specialty Store	104-106 Superior St. W.
SL-DUL-00154	Gately Store	Commerce/Trade, Specialty Store	123 Superior St. W.
SL-DUL-00155	Walgreen's Drug Store	Commerce/Trade, Specialty Store	121 Superior St. W.
SL-DUL-00069	Peter Pan Cleaners	Commerce/Trade, Specialty Store	122 North 3rd Ave. W.
SL-DUL-01220	Gilbert Building	Commerce/Trade, Specialty Store	209-211 1st St. W.
SL-DUL-01219	Altman Clothing	Commerce/Trade, Specialty Store	201-207 1st St. W.
SL-DUL-00156	George Gray Department Store	Commerce/Trade, Department Store	113-119 Superior St. W.
SL-DUL-00190	Harbor Building	Commerce/Trade, Specialty Store	102 Superior St. W.
SL-DUL-00153	Commercial building - North shore bank of commerce	Commerce/Trade, Specialty Store	129-131 Superior St. W.
SL-DUL-00231	Parking ramp (Nonextant)	Landscape, Parking Lot	16-20 North 2nd Ave. W.
SL-DUL-00071	Natchios Greek Restaurant	Commerce/Trade, Restaurant	109 North 2nd Ave. W.
SL-DUL-00157	Aster Theatre	Recreation and Culture, Theater	109 Superior St. W.
SL-DUL-00070	Leone's Cleaners and Tailors	Commerce/Trade, Specialty Store	115 North 2nd Ave. W.
SL-DUL-00230	Commercial building	Commerce/Trade, Financial Institution	202 1st St. W.
SL-DUL-00093	Bayha and Company Furniture	Commerce/Trade, Business	131 1st St. W.
SL-DUL-00229	Commercial building	Commerce/Trade, Specialty Store	105 Superior St. W.
SL-DUL-02390	Young Women's Christian Association of Duluth (YWCA)	Social, Civic	202 2nd St. W.
SL-DUL-04116	Bridge 69816E	Transportation, Road-Related (Vehicular)	Lake Avenue and I-35 Interchange
SL-DUL-00124	Commercial building	Commerce/Trade, Specialty Store	118-138 1st St. W.
SL-DUL-00126	Pasek Pharmacy, Jerry Lee's Restaurant,commercial building	Commerce/Trade, Specialty Store	114-116 1st St. W.
SL-DUL-00125	Deluxe Coney Island-Rowley Building	Commerce/Trade, Specialty Store	112 1st St. W.
SL-DUL-00191	Great Northern Power Company/Minnesota Power & Light	Industry/Processing/Extraction, Extractive Facility	30 W Superior St
SL-DUL-00158	Hunter Building	Commerce/Trade, Specialty Store	31 Superior St. W.
SL-DUL-00159	Commercial building	Commerce/Trade, Specialty Store	29 Superior St. W.
SL-DUL-02004	Gulleson Shoe Store	Commerce/Trade, Specialty Store	21 North 1st Ave. W.
SL-DUL-00127	Ideal Market & Bakery	Commerce/Trade, Specialty Store	102 1st St. W.
SL-DUL-01212	Rowley Building	Commerce/Trade, Specialty Store	108 1st St. W.
SL-DUL-00072	Auto Garage	Transportation, Road-Related (Vehicular)	120-122 North 2nd Ave. W.

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-00160	Commercial building	Commerce/Trade, Specialty Store	25 Superior St. W.
SL-DUL-02391	Duplicate Number - See SL-DUL-000127 (Ideal Market & Bakery)	Commerce/Trade, Specialty Store	102 1st St W
SL-DUL-00094	Gershgol Grocery	Commerce/Trade, Specialty Store	123 1st St. W.
SL-DUL-00233	Action Pawn and Gopher Shoe Repair	Commerce/Trade, Specialty Store	16-18 North 1st Ave. W.
SL-DUL-00075	Duplicate Number - See SL-DUL-00072 (Auto Garage)	Transportation, Road-Related (Vehicular)	120 2nd St. W.
SL-DUL-00236	Crown Christian Center	Religion, Religious Facility	13-15 Lake Ave. N.
SL-DUL-00234	Printing Express	Commerce/Trade, Specialty Store	22-26 North 1st Ave. W.
SL-DUL-00096	Frederick Hotel	Commerce/Trade, Specialty Store	105 W 1st St.
SL-DUL-00095	Columbia Block-Norman's Bar Bldg	Commerce/Trade, Specialty Store	113-115 1st St. W.
SL-DUL-00161	Commercial Building	Commerce/Trade, Specialty Store	21-23 Superior St. W.
SL-DUL-00164	Wirth Building	Commerce/Trade, Specialty Store	13 Superior St. W.
SL-DUL-00128	Pearson Block-Duluth Liquor	Commerce/Trade, Specialty Store	26-32 1st St. W.
SL-DUL-00162	Commercial building-sportsman's headquarters	Commerce/Trade, Specialty Store	17-23 Superior St. W.
SL-DUL-00101	European Bakery-New England Hotel	Commerce/Trade, Specialty Store	109-111 W 1st St.
SL-DUL-00097	East End Ice and Coal- Life House Youth Center	Commerce/Trade, Specialty Store	31 1st St. W.
SL-DUL-00129	Cantonese House-commercial building	Commerce/Trade, Specialty Store	24 1st St. W.
SL-DUL-00166	Norris-MacDougal Block	Commerce/Trade, Specialty Store	5-7 Superior St. W.
SL-DUL-00163	Commercial Building	Commerce/Trade, Specialty Store	15 Superior St. W.
SL-DUL-04117	Bridge 69816F	Transportation, Road-Related (Vehicular)	Lake Avenue and I-35 Interchange
SL-DUL-00098	commercial building-Life House Youth Center	Commerce/Trade, Specialty Store	29 1st St. W.
SL-DUL-00130	Young at Heart	Commerce/Trade, Specialty Store	22 1st St. W.
SL-DUL-00800	Commercial building	Commerce/Trade, Specialty Store	3-9 Superior St. E.
SL-DUL-00167	Bell and Eyster	Commerce/Trade, Specialty Store	3 Superior St. W.
SL-DUL-00803	Old Jolly Fisher Restaurant	Commerce/Trade, Specialty Store	27 Superior St. E.
SL-DUL-00066	Merrit and Hector Printers	Commerce/Trade, Specialty Store	108-114 North 1st Ave. W.
SL-DUL-00131	E.F. Berg Hotel Supplies	Commerce/Trade, Specialty Store	20 1st St. W.
SL-DUL-00251	Plaunt Company Plumbing	Commerce/Trade, Specialty Store	121-123 North 1st Ave. W.
SL-DUL-00168	Poirier's Boots and Shoes	Commerce/Trade, Specialty Store	1 Superior St. W.
SL-DUL-00099	Arthurs Formal Wear	Commerce/Trade, Specialty Store	25 1st St. W.
SL-DUL-00132	Sanitary Plumbing-Glenwood trophy	Commerce/Trade, Specialty Store	18 1st St. W.
SL-DUL-00165	Silberstein and Bondy Dry Goods Company	Commerce/Trade, Specialty Store	9-11 Superior St. W.
SL-DUL-00252	Chum Drop-In Center	Social, Civic	125 N. 1st Ave. W
SL-DUL-00237	Commercial building-Bayly building	Commerce/Trade, Specialty Store	17-19 Lake Ave. N.
SL-DUL-00193	Vacant lot	Recreation and Culture, Theater	16 Superior St. E.
SL-DUL-00238	Nortun Lodge #126 Sons of Norway	Social, Meeting Hall	21-23 Lake Ave. N.
SL-DUL-02644	Parking lot	Landscape, Parking Lot	9-23 1st St. W.
SL-DUL-00133	Bridgeman & Russell	Commerce/Trade, Specialty Store	14-16 1st St. W.
SL-DUL-00067	Commercial Electric Company	Commerce/Trade, Specialty Store	118 North 1st Ave. W.
SL-DUL-00135	Spina Building-Dreamland bar;Willis Supply Co./Shishka Bar	Commerce/Trade, Specialty Store	2-8 1st St. W.
SL-DUL-00134	Bridgeman-Russell Block	Commerce/Trade, Specialty Store	10-16 1st St. W.
SL-DUL-00235	Tremont Hotel	Domestic, Hotel	12 Lake Ave. N.
SL-DUL-00076	Commercial building - Duluth Teachers Credit Union	Commerce/Trade, Specialty Store	28 2nd St. W.
SL-DUL-00196	Wieland Block	Commerce/Trade, Specialty Store	26 Superior St. E.
SL-DUL-00194	J. J. Costello Hardware and Stoves	Commerce/Trade, Specialty Store	22-24 Superior St. E.
SL-DUL-00169	Commercial building	Commerce/Trade, Specialty Store	13 Superior St. E.
SL-DUL-00136	First Bank Drive-In	Commerce/Trade, Financial Institution	10 1st St. E.
SL-DUL-03922	Bridge 69857	Transportation, Pedestrian-Related	Connecting Superior Street to Gichi-Ode' Akiing Park
SL-DUL-00802	Jeronimus Floral	Commerce/Trade, Specialty Store	11 1/2 Superior St. E.
SL-DUL-00170	Commercial building	Commerce/Trade, Specialty Store	17 Superior St. E.
SL-DUL-00801	Bridgemen's	Commerce/Trade, Specialty Store	11 Superior St. E.
SL-DUL-00171	Commercial building	Commerce/Trade, Specialty Store	21 Superior St. E.
SL-DUL-00100	HBJ Publications Inc	Commerce/Trade, Specialty Store	1-7 1st St. W.
SL-DUL-00172	Commercial building - music center	Commerce/Trade, Specialty Store	23-25 Superior St. E.
SL-DUL-00078	Duluth Masonic Temple	Social, Meeting Hall	4 2nd St. W.
SL-DUL-00197	Hayes Block	Commerce/Trade, Specialty Store	30-38 Superior St. E.
SL-DUL-00198	Astoria Hotel-Northern lights/Chinese Dragon	Commerce/Trade, Specialty Store	102-108 Superior St. E.
SL-DUL-02645	Granite retaining wall	Landscape, Street Furniture/Object	9 1st St. E.
SL-DUL-00137	Commercial building	Commerce/Trade, Specialty Store	18 1st St. E.
SL-DUL-00173	Last place on earth	Commerce/Trade, Specialty Store	29-33 Superior St. E.

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-00103	Interstate Auto	Commerce/Trade, Specialty Store	5-7 1st St. E.
SL-DUL-00138	Duluth Candy Factory	Commerce/Trade, Specialty Store	20 1st St. E.
SL-DUL-01208	Hockin Furniture Co.	Commerce/Trade, Specialty Store	5 1st St. W. (formerly 1 - 7 W 1st St)
SL-DUL-00102	Builders Exchange Building	Commerce/Trade, Specialty Store	1-3 1st St. E.
SL-DUL-02353	Granada Theater	Recreation and Culture, Theater	109 Superior St. E.
SL-DUL-00139	Commercial building - Duluth Teachers Retirement Fund	Commerce/Trade, Specialty Store	22 1st St. E.
SL-DUL-00804	Granada News & Book	Commerce/Trade, Specialty Store	111 Superior St. E.
SL-DUL-00805	China Night Restaurant	Commerce/Trade, Restaurant	113 Superior St. E.
SL-DUL-00199	Vacant lot - Sears parking lot	Commerce/Trade, Specialty Store	110-116 Superior St. E.
SL-DUL-00174	Grand Hotel	Domestic, Hotel	101-105 Superior St. E.
SL-DUL-00200	Peterson Buffet-chamber of commerce	Commerce/Trade, Specialty Store	118 Superior St. E.
SL-DUL-00807	C.H. Oppel Block	Commerce/Trade, Restaurant	117 Superior St. E.
SL-DUL-00201	Delray Hotel	Commerce/Trade, Specialty Store	120 Superior St. E.
SL-DUL-01071	Singer and Associates	Commerce/Trade, Specialty Store	26 E. 1st St.
SL-DUL-00808	Commercial building	Commerce/Trade, Specialty Store	119 Superior St. E.
SL-DUL-02646	US Bank Parking Garage	Landscape, Parking Lot	2-28 1st St. E
SL-DUL-01072	Corner Cafe	Commerce/Trade, Specialty Store	35 1st St. E.
SL-DUL-00202	Service Motor Company, Drivers' Union Hall	Commerce/Trade, Specialty Store	124 Superior St. E.
SL-DUL-00152	Duplex	Domestic, Multiple Dwelling	316 1st St. E.
SL-DUL-00104	Salo Building-Dunlap Building	Commerce/Trade, Specialty Store	15-17 1st St. E.
SL-DUL-00203	Duluth City Jail	Government, Correctional Facility	126 Superior St. E.
SL-DUL-00810	Commercial building	Commerce/Trade, Specialty Store	123 Superior St. E.
SL-DUL-00106	Sher Brothers and Company	Commerce/Trade, Specialty Store	25 1st St. E.
SL-DUL-00080	Chatham Apartments	Domestic, Multiple Dwelling	10 2nd St. E.
SL-DUL-00175	Parking ramp, Fond-du-Luth Casino	Transportation, Road-Related (Vehicular)	107-123 Superior St. E.
SL-DUL-02648	Hobart Manufacturing Company	Commerce/Trade, Specialty Store	31 1st St. E
SL-DUL-00240	Duluth Steam Bath	Commerce/Trade, Specialty Store	18-20 North 1st Ave. E.
SL-DUL-01073	Mobil Service - Frenchy's	Commerce/Trade, Specialty Store	101 East 1st St.
SL-DUL-01853	House	Domestic, Single Dwelling	117 North 1st Ave. E.
SL-DUL-00105	Parking lot	Transportation	19-23 1st St. E.
SL-DUL-01854	Amity Furniture Restoration	Commerce/Trade, Specialty Store	123 North 1st Ave. E.
SL-DUL-00140	Yale Laundry-H & J (stge)	Commerce/Trade, Specialty Store	30-32 1st St. E.
SL-DUL-01211	Commercial building (razed)	Commerce/Trade, Specialty Store	106-110 1st St. W.
SL-DUL-00107	Lake Superior Liquors-commercial building	Commerce/Trade, Specialty Store	27-35 1st St. E.
SL-DUL-02505	Fire Hall #1	Government, Fire Station	22 East Second St
SL-DUL-01214	Coney Island	Commerce/Trade, Specialty Store	110 1st St. W.
SL-DUL-00205	Knudsen Automobile Company Building	Commerce/Trade, Specialty Store	202 Superior St. E.
SL-DUL-00176	Sears, Roebuck and Company	Commerce/Trade, Department Store	125-131 Superior St. E.
SL-DUL-00141	Toverilla Hotel-First Street Exchange	Commerce/Trade, Specialty Store	102-108 1st St. E.
SL-DUL-00142	Union Fur Company/Thorsell-Nesgoda Garage	Commerce/Trade, Specialty Store	110-112 1st St. E.
SL-DUL-00144	Gray Brothers Bakery-Duluth auto sales	Commerce/Trade, Specialty Store	118-120 1st St. E.
SL-DUL-00206	Interstate Auto Company	Commerce/Trade, Specialty Store	206-214 Superior St. E.
SL-DUL-03923	Bridge 69858	Transportation, Pedestrian-Related	Connecting Superior Street to Gichi-Ode' Akiing Park
SL-DUL-02647	Parking lot	Landscape, Parking Lot	101-121 1st St. E
SL-DUL-00177	Masonic Temple Opera House	Recreation and Culture, Music Facility	201-205 Superior St. E.
SL-DUL-00239	Apartment	Domestic, Multiple Dwelling	114 N. 1st Ave. E
SL-DUL-00143	Moose 505 Lodge-International Harvester Company	Social, Meeting Hall	114-116 1st St. E.
SL-DUL-00145	Model Laundry	Commerce/Trade, Specialty Store	126 1st St. E.
SL-DUL-01858	Carter Hotel	Domestic, Hotel	17-25 North 2nd Ave. E.
SL-DUL-00178	NorShor Theatre-Orpheum Service Garage	Commerce/Trade, Specialty Store	207-213 Superior St. E.
SL-DUL-02354	Jimmy's Used Cars	Commerce/Trade, Specialty Store	27 North 2nd Ave. E.
SL-DUL-00208	Gannon Auto Supplies	Commerce/Trade, Specialty Store	216-218 Superior St. E.
SL-DUL-00812	Sunnyside Cafe	Commerce/Trade, Specialty Store	214 Superior St. E.
SL-DUL-00108	Northwest Radio	Commerce/Trade, Specialty Store	123 1st St. E.
SL-DUL-02649	Clayton Jackson McGhie Memorial	Landscape, Park	130 1st St. E
SL-DUL-00241	Orpheum Theatre	Recreation and Culture, Theater	8-12 North 2nd Ave. E.
SL-DUL-00210	Rockhill Buick Company-St, Louis Cty health Dept.	Commerce/Trade, Specialty Store	222 Superior St. E.
SL-DUL-00083	House	Domestic, Single Dwelling	108 2nd St. E.
SL-DUL-00243	Duluth Cleaners and Dyers	Commerce/Trade, Specialty Store	16-18 North 2nd Ave. E.

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-00084	Commercial building	Commerce/Trade, Specialty Store	112 2nd St. E.
SL-DUL-00109	Surplus electronics-commercial building	Commerce/Trade, Specialty Store	125 1st St. E.
SL-DUL-00211	Jacob Kohn Autos and Television Center Building	Commerce/Trade, Specialty Store	228-230 Superior St. E.
SL-DUL-00147	Jenswold Motor Company-Sturm brothers supply Co.	Commerce/Trade, Specialty Store	202-206 1st St. E.
SL-DUL-02550	KBIR TV	Commerce/Trade, Specialty Store	230 E. Superior St.
SL-DUL-00209	Albert Salter Saloon	Commerce/Trade, Specialty Store	220 Superior St. E.
SL-DUL-03874	Pastoret Terrace	Domestic, Multiple Dwelling	101-107-109-111-113 N 2nd Ave E
SL-DUL-00085	House	Domestic, Single Dwelling	118 2nd St. E.
SL-DUL-00148	Parisian Dry Cleaners	Commerce/Trade, Specialty Store	208 1st St. E.
SL-DUL-00149	Motor Mart	Commerce/Trade, Specialty Store	210 1st St. E.
SL-DUL-00110	Pastoret Terrace	Commerce/Trade, Specialty Store	127-129 1st St. E.
SL-DUL-00150	Duluth Ford Exchange	Commerce/Trade, Specialty Store	214-216 1st St. E.
SL-DUL-00151	Turner Automobiles	Commerce/Trade, Specialty Store	218-222 1st St. E.
SL-DUL-00111	Shrine Temple	Social, Meeting Hall	201-207 1st St. E.
SL-DUL-00086	St. Regis Apartments	Domestic, Multiple Dwelling	117-129 North 2nd Ave. E.
SL-DUL-00179	Hotel Duluth	Domestic, Hotel	219-231 Superior St. E.
SL-DUL-00112	Peterson Building-Scarlett Feed Store	Commerce/Trade, Specialty Store	213-215 1st St. E.
SL-DUL-02650	Parking lot	Landscape, Parking Lot	226-232 1st St. E.
SL-DUL-00113	Union Gospel Mission-Martin Hotel	Commerce/Trade, Specialty Store	217-219 1st St. E.
SL-DUL-00114	Johnson Supply Co. -commercial building	Commerce/Trade, Specialty Store	231 1st St. E.
SL-DUL-00087	King Manor	Domestic, Multiple Dwelling	222 2nd St. E.
Secondary Subarea (80 Resources)			
SL-DUL-03941	Bridge 69820 (Jay Cooke Plaza Tunnel/Superior East Tunnel)	Transportation, Road-Related (Vehicular)	I-35 between 8th and 9th Avenues East
SL-DUL-01096	House	Domestic, Multiple Dwelling	712 E 1st St
SL-DUL-01098	Double House	Domestic, Multiple Dwelling	718-720 E 1st St
SL-DUL-01871	Apartment	Domestic, Multiple Dwelling	116 N 7th Ave E
SL-DUL-01095	Double House	Domestic, Multiple Dwelling	709-711 E 1st St
SL-DUL-01100	Apartments	Domestic, Multiple Dwelling	722-724 E 1st St
SL-DUL-01094	House	Domestic, Single Dwelling	707 1st St. E.
SL-DUL-01872	Duplex	Domestic, Multiple Dwelling	118-120 N 7th Ave E
SL-DUL-00831	Sir Benedict's Tavern on the Lake	Commerce/Trade, Specialty Store	805 E Superior St
SL-DUL-01874	Duplex	Domestic, Multiple Dwelling	122 N 7th Ave E
SL-DUL-01097	Adams	Domestic, Multiple Dwelling	715 E 1st St
SL-DUL-01280	Williams Apartments	Domestic, Multiple Dwelling	702-704 E 2nd St
SL-DUL-01099	St. Elmo Building	Domestic, Multiple Dwelling	721 E 1st St
SL-DUL-01101	Oxford Building	Domestic, Multiple Dwelling	725-727 E 1st St
SL-DUL-00581	Jay Cooke Monument	Recreation and Culture, Monument/Marker	London Rd. & Superior St.
SL-DUL-03682	Hollywood	Domestic, Multiple Dwelling	708-710 E 2nd St
SL-DUL-01102	Berkshire Apartments	Domestic, Multiple Dwelling	731 E 1st St
SL-DUL-00832	Kitchi Gammi Club	Social, Meeting Hall	831 E Superior St
SL-DUL-01281	Apartment	Domestic, Multiple Dwelling	711 E 2nd St
SL-DUL-01282	Apartments	Domestic, Multiple Dwelling	713-717 E 2nd St
SL-DUL-01283	Apartment	Domestic, Multiple Dwelling	719 E 2nd St
SL-DUL-01877	Duplex	Domestic, Multiple Dwelling	118-120 N 8th Ave
SL-DUL-01878	Apartment	Domestic, Multiple Dwelling	122-126 N 8th Ave E
SL-DUL-01103	Lafayette Apartments	Domestic, Multiple Dwelling	815 E 1st St
SL-DUL-01106	United Baptist Christian Church	Religion, Religious Facility	830 E 1st St
SL-DUL-01879	Duplex	Domestic, Multiple Dwelling	128-130 N 8th Ave E
SL-DUL-01104	Apartment	Domestic, Multiple Dwelling	821 E 1st St
SL-DUL-01430	House	Domestic, Single Dwelling	707 E 3rd St
SL-DUL-01286	House	Domestic, Single Dwelling	824 E 2nd St
SL-DUL-01105	Greysolon Apartments	Domestic, Multiple Dwelling	823-833 1st St E
SL-DUL-01431	House	Domestic, Single Dwelling	711 3rd St. E.
SL-DUL-01284	Duplex	Domestic, Multiple Dwelling	812-814 E 2nd St
SL-DUL-01107	Karpeles Manuscript Library	Recreation and Culture, Museum	902 E 1st St
SL-DUL-01875	Apartments	Domestic, Multiple Dwelling	318 North 7th Ave. E.
SL-DUL-01882	Kimball Flats	Domestic, Multiple Dwelling	109-111 N 9th Ave E
SL-DUL-03165	House	Domestic, Multiple Dwelling	814 E. 2nd St.
SL-DUL-01285	House	Domestic, Single Dwelling	822 E 2nd St
SL-DUL-01599	Willow Apartment	Domestic, Multiple Dwelling	702-712 E 4th St
SL-DUL-03816	Duplex	Domestic, Multiple Dwelling	801-803-805 2nd St E
SL-DUL-03030	Rowhouse	Domestic, Multiple Dwelling	121 North 9th Ave. E.

MnSHIP Sites within the AUAR area

Resource No.	Name	Resource Type	Address/Location
SL-DUL-01288	Row Flats	Domestic, Multiple Dwelling	826-834 E 2nd St
SL-DUL-03031	Rowhouse	Domestic, Multiple Dwelling	123 North 9th Ave. E.
SL-DUL-03032	Rowhouse	Domestic, Multiple Dwelling	125 North 9th Ave. E.
SL-DUL-01880	Apartments	Domestic, Multiple Dwelling	301 N 8th Ave E
SL-DUL-01600	Henry Halkman Store & Flats	Commerce/Trade, Specialty Store	701-705 E 4th St
SL-DUL-01883	Row Flats	Domestic, Multiple Dwelling	119-125 N 9th Ave E
SL-DUL-01881	Duplex	Domestic, Multiple Dwelling	305-307 N 8th Ave E
SL-DUL-01108	Albemarle Apartments	Domestic, Multiple Dwelling	914-916 1st St. E.
SL-DUL-03694	House	Domestic, Single Dwelling	716 E 4th St
SL-DUL-03676	Yorkleigh	Domestic, Multiple Dwelling	1017 London Rd
SL-DUL-01110	Apartments	Domestic, Multiple Dwelling	926-926 1/2 1st St. E.
SL-DUL-01287	Apartment	Domestic, Multiple Dwelling	825-827 E 2nd St
SL-DUL-03820	Apartment Building	Domestic, Multiple Dwelling	810-812 3rd St E
SL-DUL-03695	Duplex	Domestic, Multiple Dwelling	720 E 4th St
SL-DUL-03821	Apartment Building	Domestic, Multiple Dwelling	820-822 3rd St E
SL-DUL-04002	Bridge L6130	Transportation, Road-Related (Vehicular)	PLAZA over MSAS 148(10TH AVE E)
SL-DUL-03677	First Lutheran ELCA	Religion, Religious Facility	1100 E Superior St
SL-DUL-01432	House	Domestic, Single Dwelling	831 E 3rd St
SL-DUL-03734	Melrose	Domestic, Multiple Dwelling	402-414 N 8th Ave E
SL-DUL-04123	Mechanical Building	Other, (Blank)	1121 London Road
SL-DUL-01434	Jefferson School	Domestic, Multiple Dwelling	916 E 3rd St
SL-DUL-03832	Duplex	Domestic, Multiple Dwelling	822-824 4th St E
SL-DUL-03831	Duplex	Domestic, Multiple Dwelling	811 4th St E
SL-DUL-01291	House	Domestic, Single Dwelling	1020 2nd St. E.
SL-DUL-01884	Apartment	Domestic, Multiple Dwelling	312-314 N 9th Ave E
SL-DUL-00582	Apartments	Domestic, Multiple Dwelling	1121-1123 London Rd.
SL-DUL-01289	House	Domestic, Single Dwelling	1007-1009 2nd St. E.
SL-DUL-01293	House	Domestic, Single Dwelling	1030 2nd St. E.
SL-DUL-00833	Louis S. Loeb House	Domestic, Single Dwelling	1123 Superior St. E.
SL-DUL-01436	St. Paul's German Evangelical Lutheran Church	Religion, Religious Facility	932 E 3rd St
SL-DUL-01290	Duplex	Domestic, Multiple Dwelling	1017-1019 2nd St. E.
SL-DUL-01435	Apartments	Domestic, Multiple Dwelling	929-931 E 3rd St
SL-DUL-01292	Apartments	Domestic, Multiple Dwelling	1021-1025 2nd St. E.
SL-DUL-01113	House	Domestic, Single Dwelling	1131 1st St. E.
SL-DUL-01111	House	Domestic, Single Dwelling	1115 1st St. E.
SL-DUL-03696	Double House	Domestic, Multiple Dwelling	920-922 E 4th St
SL-DUL-00192	Bijou Theater	Commerce/Trade, Specialty Store	12-14 Superior St. E.
SL-DUL-01294	Apartment	Domestic, Multiple Dwelling	1106 E 2nd St
SL-DUL-01601	House	Domestic, Single Dwelling	915 4th St. E.
SL-DUL-03683	Apartment	Domestic, Multiple Dwelling	1031 E 2nd St
SL-DUL-01602	Apartments	Domestic, Multiple Dwelling	932 4th St. E.
SL-DUL-01603	Mandan Block	Commerce/Trade, Specialty Store	926-932 E 4th St
SL-DUL-03877	Rowhouse	Domestic, Multiple Dwelling	201-203-205-207 N 11th Ave E
SL-DUL-01112	William Heimbach House	Domestic, Single Dwelling	1123 1st St. E.
SL-DUL-01895	Hillman Realty & House	Commerce/Trade, Specialty Store	20 N 12th Ave E
SL-DUL-03684	Apartment	Domestic, Multiple Dwelling	1108-1110 E 2nd St
SL-DUL-03685	Apartment	Domestic, Multiple Dwelling	1112-1114 E 2nd St
SL-DUL-01297	Apartment	Domestic, Multiple Dwelling	1120-1124 E 2nd St
SL-DUL-01114	Chester Terrace Apartments	Domestic, Multiple Dwelling	1210-1232 E 1st St
SL-DUL-00583	Duluth Armory	Defense, Arms Storage	1301-1305 London Rd