

Department of Community Planning and Economic Development
Planning Division

Design Guidelines

Date: October 11, 2012

Proposal: St. Anthony Falls Historic District Design Guidelines

Applicant: City of Minneapolis CPED

Address of Property: St. Anthony Fall Historic District

Planning Staff and Phone: Brian Schaffer, 612.673.2670

Publication Date: October 16, 2012

Public Hearing: October 23, 2012

Ward: Wards 3 & 7

Neighborhood Organization: North Loop Neighborhood Association
Downtown Minneapolis Neighborhood Association
Marcy Holmes Neighborhood Association
Nicollet Island East Bank Neighborhood Association
St. Anthony West Neighborhood

Attachments: Attachment A: St. Anthony Falls Historic District
Design Guidelines

Attachment B: Letter from Minnesota State Historic Preservation
Office – September 18, 2012

Background

In March of 2010 the City of Minneapolis received a grant from the St. Anthony Falls Heritage Board to develop new design guidelines for the St. Anthony Falls Historic District. In December 2010 CPED issued an RFP for services to develop design guidelines for the historic district. At the close of the RFP in January 2011, CPED received twelve proposals for the project. Through meetings with the CPED review committee, one proposal stood head-and-shoulders above the pack: Winter and Company, an urban design and historic preservation firm from Boulder, Colorado. Their team includes a local sub-consultant, Close Landscape Architecture and an architectural firm Shears Adkins Rockmore from Denver, Colorado. Winter & Company has worked in over a 150 communities in 48 states and Canada.

Work to develop the guidelines began in earnest in March 2011 and continued through August 2012. The public process and engagement is outlined later in this report.

Impetus for creating new Design Guidelines

The existing St. Anthony Falls Historic District Design Guidelines were adopted by the Minneapolis Heritage Preservation Commission in 1980. In the three decades since they were adopted, the district has seen dramatic change. Access to and interaction with the falls and the river has evolved, infrastructure has been added, project plans have been developed and realized, and the understanding and knowledge of the archaeology within the district has increased. The field of preservation has also evolved from a disciplinary perspective. It is no longer sufficient to simply save and re-use a specific collection of historic buildings or properties. In order to create and sustain economically successful places, it has become critical to evaluate and carefully consider how entire environments function as a diverse, but unified cultural landscape. Guidance for preservation and development in the St. Anthony Falls Historic District has been accomplished through documents approved for specific uses, projects, or sub-areas, but it has been piecemeal. After thirty years, a comprehensive re-evaluation and a more finely grained approach to design guidelines is quickly becoming overdue.

The existing design guidelines for the historic district provide a set of architectural standards for new building construction based on a series of discrete sub-districts. The existing document was not crafted in a time when it was considered necessary to address some of the basic and key cultural landscape features of the district especially the river and the falls. The existing design guidelines document does not address the interconnected layers of transportation that weave through the district – on land and in the water. Most importantly, when the original historic district guidelines document was written and adopted, key documents that outlined the vision for the central riverfront sometimes treated the goal for creating a network of open space along the river as something mutually exclusive from the goal of preserving the historic, industrial fabric at the heart of the city.

Public Process and Engagement

Public engagement on the design guidelines has involved many outlets. The project team has held public several meetings on the design guidelines, has presented at other organizations'

Department of Community Planning and Economic Development
Planning Division

meetings and has made several presentations to the Heritage Preservation Commission (HPC) on the design guidelines. On top of our active outreach we have been utilizing a project webpage to provide updates on the process and products during the development of the design guidelines. The webpage is frequently updated and has been the primary tool in providing information about the design guidelines.

CPED has worked with the recognized neighborhood and stakeholder agencies in the project area to increase awareness of the project. In addition to the public process and outreach to gather input on the development of the design guidelines CPED formed a Technical Advisory Group (TAG) and a Community Advisory Group (CAG). The TAG and CAG were comprised of Minneapolis staff, professionals working in preservation and architecture, representatives from stakeholder agencies, and neighborhood representatives. These organizations include:

- CPED-Planning (East and Downtown sector planners)
- City of Minneapolis Public Works
- Minneapolis Park & Recreation Board
- Minneapolis Heritage Preservation Commission
- Minnesota State Historic Preservation Office (SHPO)
- National Park Service – Mississippi National River and Recreation Area
- St. Anthony Falls Heritage Board
- Preservation Alliance of Minnesota
- Preserve Minneapolis
- Minnesota State Archaeologist
- Minneapolis Chapter of the American Institute of Architects
- Minnesota Chapter of American Society of Landscape Architects
- Minneapolis Riverfront Partnership
- Friends of the Mississippi
- Downtown Minneapolis Neighborhood Association
- North Loop Neighborhood Association
- Marcy Holmes Neighborhood Association
- Nicollet Island East Bank Neighborhood Association

The following is a list of meetings which the creation and content of new design guidelines has been discussed.

- March 31, 2011: HPC meeting (public meeting) on development of the historic district design guidelines
- March 31, 2011: Community Advisory Group meeting
- April 1, 2011: Technical Advisory Group meeting
- April 6, 2011: Community meeting on the history of the historic district
- April 15, 2011: Technical Advisory Group meeting
- April 25, 2011: Technical Advisory Group meeting

Department of Community Planning and Economic Development
Planning Division

- April 25, 2011: Community workshop on the character of the historic district
- April 26, 2011: Developers Focus Group
- April 26, 2011: Designers Focus Group
- May 10, 2011: Technical Advisory Group meeting
- May 10, 2011: HPC meeting (public meeting) to review and comment on Strategy Paper for Design Guidelines
- May 10, 2011: Community Advisory Group meeting
- November 29, 2011: HPC meeting (public meeting) to review and comment on first draft of design guidelines
- November 29- January 17: Comment period for first draft of the design guidelines
- December 14, 2011: Designers Focus Group
- December 15, 2011: Technical Advisory Group meeting
- January 17, 2012: HPC meeting (public meeting) to review and comment on first draft of design guidelines
- March 28, 2012: Technical Advisory Group meeting
- March 28, 2012: Community Advisory Group meeting
- March 28, 2012: Community meeting to review second draft of design guidelines
- April 3, 2012: HPC meeting (public meeting) to review and comment on second draft of design guidelines
- April 17, 2012: HPC meeting (public meeting) to review and comment on second draft of design guidelines
- March 29 – April 30, 2012: Public comment period for second draft of design guidelines.

The draft Design Guidelines document was revised based on comments received during the public comment period from the Technical and Community Advisory Groups, stakeholder agencies and organizations, the public, City of Minneapolis staff, and the HPC. Following those revisions the document was submitted to the Minnesota State Historic Preservation Office for their official review and comment period.

The Heritage Preservation Commission's public hearing on the adoption of the St. Anthony Falls Historic District Design Guidelines will be final step in the public process to develop the design guidelines. The final document that is being considered is the result of significant input from and discussion with stakeholder agencies and organizations, the public and the HPC.

Consistency with City of Minneapolis Adopted Plans and Policies

In 2009 the City Council approved the comprehensive plan: *The Minneapolis Plan for Sustainable Growth*. The newly created design guidelines for the St Anthony Falls Historic District fully support the goals and policies of the city's comprehensive plan.

Policy 8.1 of the comprehensive plan provides the most guidance on this item and states the following: "Preserve, maintain, and designate districts, landmarks, and historic resources which serve as reminders of the city's architecture, history, and culture." The policy was supported by the following implementation steps.

- 8.1.1 Protect historic resources from modifications that are not sensitive to their historic significance.
- 8.1.2 Require new construction in historic districts to be compatible with the historic fabric.
- 8.1.3 Encourage new developments to retain historic resources, including landscapes, incorporating them into new development rather than removal.

The proposed design guidelines protect the historic resources from modifications that are not sensitive to their historic significance and they create a framework to ensure that new construction in the district is compatible with the historic fabric while allowing for creativity in design. The proposed design guidelines recognize the cultural landscape of the district and provide direction on retaining historic features and integrating new development within the existing historic fabric.

The proposed design guidelines further the policies and implementation steps of the Urban Design chapter of *The Minneapolis Plan for Sustainable Growth*.

- 10.1 Promote building designs and heights that enhance and complement the image and form of the Downtown skyline, provide transition to the edges of Downtown and protect the scale and quality in areas of distinctive physical or historical character."
 - 10.1.2 This implementation step calls for building placement to enhance public view corridors that focus attention on natural or built features. The proposed design guidelines provide guidance on building scale and massing that is based on the surrounding historic context.

REVIEWS CONDUCTED AND COMMENTS SUBMITTED:

HPC Comment and Review:

In August 2012 the HPC reviewed the final draft of the guidelines as an informational item. Several comments were discussed and most addressed in the proposed alterations by CPED identified in this report.

Department of Community Planning and Economic Development
Planning Division

The HPC asked CPED to consider adding an additional appendix that would provide links to online resources for more information on specific items such as links to the Secretary of the Interior's Standards and the National Park Service's Preservation Briefs. Links to these resources are a great idea and will be valuable in connecting interested parties to the wealth of information that exists on the topics. However, CPED believes that such online resources are better provided on the City of Minneapolis's Preservation Webpage that can constantly be managed and updated than in a static document that will not be further edited and managed after its adoption. As such this appendix has not been added.

Public Comment and Review:

The final draft of the design guidelines was posted on the project's webpage on August 23, 2012. Notices of the release of this final draft were sent to effected stakeholder agencies and neighborhood organizations as well as a broader email distribution list of people who have attended past meetings or asked to kept up to date on the project.

At the time of publication no additional comments have been received on this document.

SHPO Comment and Review:

The Preservation Chapter of the Minneapolis Code of Ordinances (Chapter 599.300) requires that a draft of the design guidelines be submitted to the Minnesota State Historic Preservation Office (SHPO) for review and comment. In accordance with the ordinance, a draft document was provided to SHPO on date. On September 18, 2012 the Minnesota SHPO provided a letter detailing their comments on the design guidelines. In their letter they state:

“Overall, we are pleased with the high quality and thoroughness of the guidelines, which we believe will go a long way toward assisting property owners, members of the Heritage Preservation Commission, architects, developers, and others in making informed decisions about appropriate ways to preserve the historic and archaeological resources and cultural landscape of the St. Anthony Falls Historic District.

Staff reviewed the guidelines and has several larger concerns that we believe need to be addressed before the guidelines are finalized. Following these points are a variety of specific comments and editorial suggestions, which we encourage you to incorporate into the final document.”

The full letter can be found in Attachment B of this report.

The following is in response to the six larger concerns that SHPO included in their letter are enumerated below. For each topic, SHPO's comment is stated followed by CPED's response and proposed actions.

General comments from SHPO:

Comment #1: “The Character Areas beginning in Chapter 10 on page 123 are an important part of the entire guidelines. For this reason, we believe the Character Areas need to be

Department of Community Planning and Economic Development
Planning Division

referred to more regularly and more frequently earlier in the document, so that it is clear to the reader that more specific details are available in that section.”

CPED Response: Reinforcing the importance of Chapter 10: Character Areas is important. Significant efforts were taken to make the document accessible to users. Part of these efforts was to create a guide to using the document. On page 3 of the document a table was included to identify which chapters may apply for certain types of project.

There are also several references to the Character Areas chapter in the guidance of the document. This is offered in the Intent statements before the guidelines for applicable section. The following list indicates where this is currently in the document.

- p. 43 Chapter 6 Landscape, Streetscape and Open Space: last paragraph references Chapter 10
- p.46 Landscape Design Intent statement
- p.48 Open Space & Park Intent Statement
- p.106 New Infill Building Guidelines- Building Mass, Scale and Height section, Intent Statement

CPED Proposed Action: The following list identifies where additional and revised references will be added to further connect the subject guidance in each chapter with the detailed guidance in Chapter 10 Character Areas. These are included in the alterations recommended by CPED to the final document.

1. p.40 Historic Infrastructure Intent Statement
***Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for historic infrastructure guidelines specific to each character area.)”*
2. p. 47 Streetscape Design Intent Statement
***Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for streetscape guidelines specific to each character area.)”*
3. p. 99 New Infill Building Guidelines opening paragraph
***Add** after second paragraph: “The guidance in this chapter is further refined and applied in Chapter 10: Character Areas. The intent is that these two chapters should be used together.”*
4. p. 99 New Infill Building Guidelines Intent statement
***Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for building placement and orientation guidelines specific to each character area.)”*
5. p.106 Building Mass, Scale and Height Intent Statement
***Revise** last sentence of Intent Statement to read“(See Character Areas in Chapter 10 for building mass, scale and height guidelines specific to each character area.)”*

Department of Community Planning and Economic Development
Planning Division

Comment #2: “Referring to page 90, we would caution that not all technologies are appropriate to historic buildings, in fact, they can sometimes be damaging. Just because it is possible to install new technologies, it is not always beneficial or appropriate to do so on historic buildings. We are concerned that the message is that energy benefits take priority over preservation. Energy conservation alone is not sufficient justification for replacement or modification to historic material where it can be repaired.”

CPED Response: Step 5: Add Energy-Generating Technologies Sensitively is the fifth step in Planning a Rehabilitation Project for Energy Efficiency which begins on page 87. The ‘steps’ direct users to look at all other energy efficiency options before considering the adding energy-generating technologies.

The first paragraph under Step 5 clearly furthers this statement and the second paragraph talks about what to consider when adding energy-generating technologies. The first sentence states “When it is indicated that installing new technologies would be beneficial, it is important to maintain the resource’s integrity and the ability to interpret its historic significance.”

CPED Proposed Action: To address SHPO’s comment CPED is proposing to add the following after the first sentence of the second paragraph:

***Add:** the following sentence after the first sentence of the second paragraph on page 90: “As such, it may not be appropriate to install some or all technologies on resources within the historic district.”*

Comment #3: “Within Chapter 10, multiple sub-districts refer to proposed modifications based on the phrase “within existing range” of building stock. Some existing buildings in these Character Areas are not appropriate to the historic district and should not be included as precedent.”

CPED Response: In most of the character areas the guidance offered states that “New infill shall be within the range of heights seen historically in the area with a maximum of height of [x] stories.”

In the Basset Creek Sawmill Area, page 142, there are no historic buildings- the area evolved during the period of significance and was last used as a rail yard. Since there are no historic building to reference the guidance on height followed the existing height policy for the adjacent 19th Century Warehouse area of the Minneapolis Warehouse Historic District Design Guidelines, the Secretary of the Interior Standards for Rehabilitation, the Comprehensive Plan policies and the Zoning Ordinance. The guidance on page 143 #10.37 states “New infill shall be within the range of heights that currently exist in the area with a maximum height of six stor[i]es”

In the Nicollet Island Central Mixed-Use District, page 150, guideline 10.48 states “New infill shall be within the range of heights and widths that currently exist.”

Department of Community Planning and Economic Development
Planning Division

SHPO's comment appears to be addressing this specific guideline. The intent of this guidance was to reflect the remaining historic context, not reference new construction.

CPED Proposed Action: To address SHPO's comment CPED is proposing to alter this guideline.

Revise 10.48 to read "New infill shall be within the range of heights and widths of historic buildings that currently exist."

Comment #4: "Referring to page 44, mid-page, there is an explanation for what a "volunteer" is not, but no explanation for what the term refers to. "Volunteer" needs to be more clearly defined, with an indication of where this treatment must be applied."

CPED Response: The first paragraph of page 44 describes how the vegetation existed in the historic industrial areas of the District. The second paragraph then states that "In this document this aesthetic of planting locations and character of vegetation is described as volunteer." The paragraph then goes on to state what 'volunteer' is not.

CPED Proposed Action: CPED is not proposing any changes to address this comment.

Comment #5: "For Character Area B, the Gateway District, it is not apparent why 30-story buildings are considered appropriate in this area. Though there are not a large number of historic buildings in the actual area, the Post Office and buildings all around the edge of the district are of significant importance and infill should not be allowed in these areas. Also, it is unclear what the terms "high-quality" and "signature" mean in this context. What are these and why are they considered distinctive or appropriate?"

CPED Response: Throughout the public process to develop the design guidelines there was considerable discussion around the topic of infill development in the entire historic district and specifically within the Gateway District given the non-contributing high-rise housing infill that has occurred since the district was first designated. Several of these buildings are over twenty stories in height, the most recent development, the Carlyle exceeds thirty stories. On the few potential development sites that exist in Gateway District it was felt that new high-rise development would not have further impact on the integrity and significance of the district. The description and intent statement summarizes the area's importance and the intent of the guidance offered in this section.

SHPO's comments also discuss the edges of the sub-district and how resources relate to historic resources within the sub-district.

Regarding the terms "high-quality" and "signature". The intent was to encourage new infill development to have a distinct design that stands alone and does not attempt to mimic the architectural features of the historic resources in the character area.

Department of Community Planning and Economic Development
Planning Division

CPED Proposed Action: To address SHPO's comments CPED is proposing the following alterations to ensure that development recognizes the adjacent context of historic resources:

Revise: 10.24. a- c as follows:

10.24 *The maximum building height should not exceed the height of 30 stories.*

- a. *High-rise, mid-rise and low-rise building heights are most appropriate (See page 103 for building height classifications.)*
- b. *Taller buildings and portions of buildings should be set back from the river corridor edges and historic buildings.*
- c. *For high-rise buildings, a low-rise podium is encouraged along the street.*

Comment #6: "A number of Character Areas recommend that no new development occur, but then allow for "interpretive" structures or development in general. However, no guidance is offered for any of these structures that could possibly be built. This must be defined far more clearly."

CPED Response: There are two character areas that are along the edge of the Mississippi River where the development of new buildings would likely be inappropriate due to historic development patterns, historic uses of these areas and their current use as park land. However, in the development of the design guidelines it was recognized that categorically not allowing any building or structure may be not in keeping with the initiatives to reuse these areas for recreation and interpretation.

The two character areas that reflect this ideology are:

- A1. West Side Water Power District River Edge
- A2. Hennepin Island and East Channel River Edge

Pages 132 through 135 of the document address these two areas. In both areas the following is offered regarding Building Design:

"Generally this area is not appropriate for new buildings; however, an interpretive building design concept for this area could be developed that would enhance educational and preservation goals."

Guidance in A2 Hennepin Island and East Channel River Edge goes on to state "Use former development patterns and historic maps for reference in site design and orientation of new structures and buildings."

There was discussion about size, height, material and other design features of these buildings. In the end it was decided that trying to address these design features with specific guidelines may not be the best approach given that any proposed building or structure would likely be unique and require significant conversations with all involved stakeholders. The result was the language included in the guidelines.

Department of Community Planning and Economic Development
Planning Division

It should be noted the extra sentence offered in A2 Hennepin Island and East Channel River Edge was meant to also be applied to the A1 West Side Water Power District River Edge area.

CPED Proposed Action: To better clarify the intent of the guidelines and better align it with the system of guidance offered in the document CPED is proposing modifying both the Building Design sections in A1 and A2 by adding “will be considered” meaning that it is not allowed by right, but is something that could occur given the circumstance defined in the intent statement.

Revise: to A1 (p. 133) and A2 (p.135) *Building Design* to read as follows: “Generally this area is not appropriate for new buildings; however, an interpretive building design concept for this area that enhances educational and preservation goals will be considered.”

Add: the following sentence to the end of the last paragraph under *Building Design* on page 133. “Use former development patterns and historic maps for reference in site design and orientation of new structures and buildings.”

Specific comments from SHPO:

The following is a response to the specific comments submitted by SHPO that were organized by page number. SHPO’s comment is stated followed by CPED’s response and proposed actions. In some cases there are no CPED comments or proposed actions addressing the SHPO comment.

Page 3: “It appears that several check marks could be added for certain categories that apply under specific chapters. For instance, we would suggest that Chapter 1 applies to Archaeological Resource; Chapters 5 and 7 both apply to landscape, Streetscape & Open Space; and Chapter 6 applies to Historic Infrastructure”

CPED Proposed Action: Checkmarks will be applied as suggested.

Add: Checkmark for Archaeological Resources under Chapter 1

Add: Checkmarks for Landscape, Streetscape & Open Space under Chapters 5 and 7

Add: Checkmark for Historic Infrastructure under Chapter 6

Page 9: Under the heading "Deconstruction," the second sentence uses the word "may" which suggests this is appropriate. We would suggest changing the sentence to: "This is typically employed when a building is to be relocated or when the materials are to be reused in other building projects."

CPED Proposed Action: Revise as follows

Revise: by removing “may be” and adding “is typically” to read as follows: “This is typically employed when a building is to be relocated or when the materials are to be reused in other building projects.”

Department of Community Planning and Economic Development
Planning Division

Under the heading "Demolition," the definition uses the term "structure" rather than "building." Since a building can be defined differently than an object or a structure, perhaps it would be better to replace "structure" with "building" in this case.

CPED Proposed Action: Revise as follows

Revise: by adding the word "building" after structure and replacing the word "structure" in the second sentence with "resource" to read as follows: "Any act or process that destroys, in part or whole, a structure, building or site is considered "demolition." This is inappropriate for any contributing resource."

Page 10: In Step 3 we wonder if the functional requirements are indeed the only thing driving the work. What about building compatibility to a proposed program?

CPED Response: No revisions proposed here. See proposed revisions for page 13.

Page 11: Are there any maps that will be included in the guidelines to show contributing and non-contributing properties?

CPED Response: There is not one *complete* resource documenting all of the resources within the district. Making a map of the contributing and non-contributing resources would overlook substantial numbers of resources and would be misleading to all that use the suggested map. As such, at this time a map will not be created.

Page 13: Our comments regarding page 10 apply for Step 3 here as well. The wording implies that any use can be put into a building, which may be inaccurate.

CPED Response: Guideline 8.1 for general rehabilitation guidelines on page 61 follows the Secretary of the Interior Standard's for Rehabilitation by seeking compatible uses for historic buildings. CPED recognizes that this Standard is not clearly represented in Step 3 on page 10.

CPED Proposed Action:

Add: after the fourth sentence "In some cases the proposed use will not be appropriate for the building. Other buildings or sites should be examined for the proposed use."

Page 20: Under the heading "Indigenous Populations" the accepted spelling is "Ojibwe" rather than "Ojibwa." Also, the end of that paragraph needs a period.

CPED Proposed Action: Revised as suggested

Revise: replace the 'e' with an 'a' to read "Ojibwa"

Add: period at end of third paragraph

Page 21: In the 3rd paragraph, "Ojibwa" should be changed to "Ojibwe."

Department of Community Planning and Economic Development
Planning Division

CPED Proposed Action: Revised as suggested
Revise: replace the 'e' with an 'a' to read "Ojibwa"

Page 25: In the first paragraph, 4th line, insert "a" before "coal-fired."

CPED Proposed Action: Revised as suggested
Add: "a" before "coal-fired"

Page 27: 5th line, "Ojibwa" should be changed to "Ojibwe."

CPED Proposed Action: Revised as suggested
Revise: replace the 'e' with an 'a' to read "Ojibwa"

Page 41: 5.3.c. Putting a glass atrium through a building is confusing and perhaps inappropriate.

CPED Response: The intent of this guidelines is to state that interpretation in building design may be considered in lieu of maintaining the rail corridors and spurs as open space where site constraints can demonstrated to be prohibitive to any feasible use or development of a site not just the proposed project.

Revise: 5.3.c as follows "The enclosure of rail corridors and spurs in a building is generally inappropriate. However, it will be considered if the design clearly interprets the historic function of the space and it can be demonstrated that site constraints make the reuse of the site not feasible."

Page 42: 5.5.b. We do not understand what a compatible substitute material would be; please clarify.

CPED Response: The replacement material for historic paving materials that too deteriorated to repair is not identified. There are several variables to consider in the replacement including new products on the market, cost and extent of the material. Given this the intent of the guideline is to allow for a conversation at the time of a proposed project a conversation with the City of Minneapolis Public Works department, CPED, the Heritage Preservation Commission and other stakeholders to inform what materials are considered suitable.

Page 47: 6.5.a. Designs that interpret history should not include the salvage and rearranging of historic pieces into a completely different thing. Allowing this to occur would result in a false sense of history.

Page 48: The illustration shows a sidewalk paving pattern that is not encouraged, yet it is shown with appropriate plantings, which is confusing. This could be clarified. Will the guidelines provide any guidance on what species are acceptable and not acceptable?

Department of Community Planning and Economic Development
Planning Division

CPED Response: The various hatching on the sidewalk and building are there for readability. It is understood that this could be confusing and is currently noted in the caption for this graphic.

The guidelines will not specify planting species as there are too many species to narrow down to those that are fitting with the context and those that are not. This will be discussed and evaluated in the context of proposed projects.

Page 51: Regarding "key views" we have concerns that they may be too limiting. What about the views of the building you are working on? Perhaps there needs to be two kinds of views: iconic of the district, and specific to your building and site.

CPED Response: At this time "key views" are defined on page 51 as "...is one that is from [the] public way and looks to a built or natural feature that is widely recognized by the public to be of importance." The intent is focused for this document. Additional discussion, identification, and evaluation of views in a broader sense as suggested in SHPO's comments may be the subject of future considerations for revisions and enhancements to this document, but are not in the scope of this proposed document.

Page 52: We have concerns that the notation styles used on this map are too limiting. It suggests that only the center of each circle is important. In addition, many of the views are down old railroad lines, in between buildings rather than out to the river. In the key, site 8 should be changed to "From Mill City Museum."

CPED Response: The station points, in dotted circles or polygons represent, represent where the point of which one observes the view shed. The view shed is represented by the various arrows around the station point.

In the case of the map on page 52 the nine view opportunities were identified in a community workshop. With the exception of three views these were all in the Waterpower Character Area, which contains the former mills and associated waterpower infrastructure. The view sheds identifies are primarily toward the river as denoted by the arrows.

Page 55: Does it make more sense to match the National Park Service (NPS) guidance regarding balconies and limit the balcony width to one bay in order to prevent them from becoming too wide? Some NPS staff argue that no new balconies should be allowed at all, pointing out that balconies fit in residential areas, not industrial areas. Also, is 7.8.b. meant for roof decks rather than balconies?

CPED Response: Balconies on secondary or tertiary facades will be considered, but not on primary facades. This is a similar treatment as was used in the Warehouse Historic District Design Guidelines and is seen as a place where the adaptive reuse of the district from an industrial area to a mixed-use

Department of Community Planning and Economic Development
Planning Division

area manifests itself in desired livability features. SHPO's comments are good suggestions to refine the guidance offered under 7.9.

The intent of 7.8.b is where balconies are allowed on secondary facades they should be kept back one structural bay to further mitigate any impact to the primary facade of a building.

CPED Proposed Action:

Revise: *7.9.b to read "Mount a balcony to accentuate historic defining features. The balcony should fit within an existing opening and should not exceed one structural bay in width."*

Page 58: Staff has seen historic signs preserved, but with the lettering changed (e.g. new name). Should that be addressed? It might be also be useful to restrict fixture changes on signs, so that neon cannot be changed to LED, for instance.

Perhaps there should be more guidance on way finding signs, so that they meet design requirements.

Under the heading "Intent," in the second sentence, delete the word "to."

CPED Response: The intent is that historic signs are preferred and that includes their lettering and message. CPED does not feel these needs to be further clarified in the guidelines.

The lighting of signs has is not specifically addressed. A change like this would require review by the HPC and could be considered after a thorough review of the proposal. As technology changes and some replacement might be acceptable given how closely the substitute lighting matches the historic lighting.

Way finding signs in the St. Anthony Falls Historic District are proposed and managed by several entities of government and non-profits. CPED believes that guideline 7.19 which states "Contemporary designs that do not create a false sense of history are appropriate." provides sufficient guidance without dictating a specific design aesthetic.

CPED Proposed Action:

Remove: *"to" in Intent statement between "signage" and "for"*

Page 59: For building types, what about institutional buildings in the district, such as a church or post office?

CPED Response: Institutional buildings are a distinct building type within the historic district and include the Post Office, Our Lady of the Lourdes Church, the Pillsbury Library. These are unique buildings that stand out for many reasons from the three general types of buildings identified on pages 59 and 60. CPED believes

Department of Community Planning and Economic Development
Planning Division

that adding a section summarizing these unique building types is not necessary in this document due to their differing characteristics.

Page 60: The illustration of the house on Nicollet Island does not strike staff as being "simple" in form. Is there another example to illustrate?

In the second paragraph, 7th line, change the sentence to read "Upper-story windows are smaller... "

CPED Proposed Action: Revised as suggested

Revise: second to last sentence to read "Upper-story windows are smaller..."

Page 61: In the sidebar, add an apostrophe in "Services"

CPED Proposed Action: Revised as suggested

Revise: add apostrophe to side bar to read "...the National Park Service's web site..."

Page 63: 8.5.a. We wonder if "desired" results should be replaced with "appropriate" results. Under 8.6 it is not clear that this refers to missing elements; this should be stated. Page 76 is not the correct illustration for 8.6. 8.6 and 8.7 need to be reversed.

CPED Proposed Action: Revised as suggested

Revise: 8.5.a. to read "Use the gentlest means possible that will achieve the appropriate results."

Remove: the following from 8.6.a. "(See page 76 for an illustration of a simplified cornice design as an example.)"

Page 64: 8.10.b. The language should be changed to "Remove only those materials which are deteriorated beyond repair." Under 8.13.c. Green materials should also convey similar character.

CPED Proposed Action: Revised as suggested

Revise: 8.10.b. to read as follows "Remove only those materials which are deteriorated beyond repair and must be replaced."

Page 65: We recommend including information that deals with materials with acquired significance.

Page 66: 8.16.b. composite wood has not been proven to be a good substitute material.

CPED Response: Due to the lack of visibility and the public demand for these products it was determined that their use may be considered and will require a case-by-case decision.

Page 69: 8.21 we recommend only repointing where needed; 100% consistency in appearance should not be the goal.

Department of Community Planning and Economic Development
Planning Division

CPED Proposed Action: Revised as suggested

Revise: 8.21 to read *“Repoint mortar joints only where there is evidence of deterioration.”*

Page 71: 8.27 we suggest modifying the sentence to: . "When replacing a door, use a design that has an appearance similar to the original, or one associated with similar structures of a similar style and age.

CPED Proposed Action: Revised as suggested

Revise: 8.27 to read *“When replacing a door, use a design that has appearance similar to original, or one associated with similar buildings of a similar style and age.”*

Page 72: The storefront in the illustration appears to be missing a bulkhead and kickplates. If so, perhaps a different building should be used. In the second sentence, "standards" should be singular. Under 8.29, we suggest adding "unless the current storefront has gained significance of its own" or something similar. Under 8.30.b., we recommend including a reference to "existing storefronts in style and age" within the sentence. Under 8.31, "kickplate" should be replaced with "bulkhead." A kickplate is a metal panel at the bottom of a door. Finally, we would encourage a discussion of awnings and signage here.

CPED Proposed Action: Revise 8.31 & 8.32 as suggested

Revise: 8.31, 8.31.a., 8.3.b., and 8.32.a., replace *“kickplate”* with *“bulkhead”*

Page 77: This section should provide some guidance as to what kinds of criteria are used when evaluating replacement windows. For example, a replacement unit should match a historic window in configuration, operation, profile and general appearance.

CPED Response: Not including this information was an oversight. It is addressed as proposed addition below.

CPED Proposed Action: Utilize similar guidance offered in the Minneapolis Warehouse Historic District Design Guidelines

Add: new 8.38.b-d. as follows

- b. *When considering the replacement of historically significant windows, new windows should be compatible in material, type, style, operation, sashes, size of lights and number of panes of the existing windows in that location.*
- c. *True divided lights are required when replacing a divided light window.*
- d. *Where true divisions are not possible, applied muntins, with an interstitial spacer will be considered. Applied muntins shall be installed on both sides of the glass.*

Page 78: 8.40.c, reuse of a historic cornice on another building should only be undertaken after careful consideration; this is not an accepted preservation practice.

Department of Community Planning and Economic Development
Planning Division

CPED Response: The guideline states that this will be considered. Will be considered items require further review and consideration by the HPC and CPED and not allowed by right.

Page 79: This page should include a discussion of parapet caps – coping. Historic caps such as metal, stone and terra cotta should be retained during all roofing work.

CPED Response: Revised as suggested

Add: *a new 8.4.c “Historic parapet caps, such as metal, stone, and terra cotta should be retained”*

Page 81: 8.46.b. does this mean that dark photovoltaic is appropriate or when the roof itself was dark historically? Perhaps this needs to be addressed on an individual basis. Section 8.47 needs clarification. Why are metal roofs different than any other roof? Metal roofs, like any other roof material should match the historic in color, texture and detailing.

CPED Response: This is better addressed on pages 94 - 96 under “Solutions for Energy Generating Technologies” There are several guidelines (8.66-8.70) that provide more information on this technology.

Guideline 8.47 can be rolled into 8.46

CPED Proposed Action:

Remove: *8.46.b “Shingles that contain embedded photovoltaic systems are also appropriate in dark colors”*

Revise: *8.46.c to state “Historic materials and specialty materials such as tiles, metals, and wood should be replaced with a matching material”*

Remove: *8.47 and 8.47.a*

Page 84: The discussion about additions should consider not just the building itself but the general neighborhood as well. The middle and bottom illustrations (and accompanying text) should show a hyphen or separation or setback between the buildings.

Page 85: 8.57, we recommend a 14-foot tall maximum height addition, and one that is not visible from multiple vantage points. For 8.57.e., we would add " ... compatible in material and shape."

CPED Response: Revised as suggested

Renumber 'b - f' as 'c - g'.

Add new 'b' to read as follows: *“The maximum height of an addition should not exceed 14 feet as measured from the structural roof deck to the existing building.”*

Revise: *former 8.57.e. to read as follows “The addition is distinguishable as new and is compatible in material and shape.”*

Page 86: It would be helpful to include more guidance on scale, appearance, and materials of new accessory structures.

Department of Community Planning and Economic Development
Planning Division

CPED Response: The guideline states that this will be considered. Will be considered items require further review and consideration by the HPC and CPED and not allowed by right. Accessory structures were not studied in detail during the development of these guidelines and require case-by-case discussion.

Page 87: In the first paragraph there is reference to energy efficiency features not being a "by-right" feature in the district. Please explain and clarify this term. Further down the page it would be helpful to cite the new National Park Service Sustainability guidelines.

CPED Response: "By-right" refers to the fact that the energy efficiency features will be considered and are not categorically allowed.

Page 89: The reference to awnings should provide guidance to avoid incompatible materials, such as corrugated materials, plastic bubble, etc. on storefronts.

CPED Response: CPED does not believe this is an appropriate location to add this information. The guidelines do not address awnings as there is separate City wide guidance adopted in the "Design Guidelines for on-premise signs and awnings."

Page 93: 8.63.c, clarify that this should occur only when the putty is deteriorated. For 8.63.d, storm windows on the outside of a house are almost always appropriate, while internal storms are difficult to ensure that no moisture accumulates. For 8.64, landscape features should follow prior rules; it would help to provide a page# reference. For 8.65, a green roof is acceptable when it is not visible from the street.

CPED Proposed Action: Revise as suggested

Revise: 8.63.c. to read as follows "Replace deteriorated glazing compound. Remove deteriorated putty with care."

Revise: 8.63.d. to read "On buildings that historically did not have storm windows, place storm windows internally to avoid altering external appearance."

Page 94: Please note that installing photovoltaic or solar panels on primary or visible sides of buildings (especially gables) goes against National Park Service guidelines.

CPED Response: See earlier response to SHPO comments regarding adding energy generating technologies to buildings.

Page 95: In the illustration, it is not clear what is meant by mounting collectors "flush." Does this mean "parallel"? Installing collectors flush would damage the roof.

Page 97: Please clarify that turbines cannot be mounted. on the front of a building.

CPED Response: See earlier response to SHPO comments regarding adding energy generating technologies to buildings.

Page 99: Please clarify that not all of the following guidance is appropriate for all subareas.

Department of Community Planning and Economic Development
Planning Division

CPED Response: The intent is that Chapter 10 further refines the guidance offered in chapter 9.

CPED Proposed Action:

Add new sentences after fourth sentence of second paragraph that reads as follows "This guidance is further refined in Chapter 10 Character Areas. These chapters should be used together."

Page 102: These points all depend on what area of the district a new building will be located in.

Page 103-104: Please clarify that existing incompatible buildings will not be included in the 3 contexts.

Page 105: We question where in the SAF historic district would a high-rise building ever be appropriate?

Page 106: 9.9.a, it is not clear where the key views are from. From other buildings? Bridges? Streets? The river? For 9.10, the taller portions of a building should also be compatible and may not loom adjacent buildings at any time.

CPED Proposed Action: Revise as follows

Add: the following to the last bullet: "Key views are maintained (see page 51 for more information on key views.)"

Page 107: 9.11, this type of variation should be dependent on where building is located.

Page 108: For the top illustration, please note that block-long massing may be appropriate in some areas and not in others. Also, perhaps it is better to focus on the number of entrances for humans, rather than creating different looking spaces.

Page 110: Please clarify the definition of a "signature" building. Are they only civic, government or religious?

Page 111: What are the primary entrances on the mill buildings: the rail side or the street side?

Page 113: 9.20.a, is glass a permitted material, or is it considered one of the two additional materials? Also, we would submit that not all materials should be allowable for all zones.

Page 115: 9.21.c, why and when will a glass curtain wall be considered acceptable?

Page 118: 9.25b, we believe this should say "muntin" not "mullion."

CPED Proposed Action: Revised as suggested

Revise: 9.25.b by replacing "mullion" with "muntin"

Department of Community Planning and Economic Development
Planning Division

Page 121: 9.32, orientation should be dictated by the district area and the historic pattern established first and then, if possible, oriented to the maximum green principles.

CPED Proposed Action: This can be better addressed in the intent statement on page 120.

Add: *the following after the first paragraph of the intent statement “Relating to the context, design characteristics and historic development patterns of the subject should be considered first, then the energy efficiency of the design.”*

Page 129: The last paragraph is confusing; does it refer to new additions or historic buildings?

Page 133: This page seems a bit contradictory because it suggests keeping a space open unless a large development is better. Also, what is meant by an "interpretive building design"?

Page 149: 10.45.c, provide more guidance to avoid oversize garages.

CPED Comments and Review

During the final review of the Design Guidelines Document CPED identified additional items that require alterations in the document. These are listed in page order.

Inside Cover: Revise *“Historic Preservation Commission” should read “Heritage Preservation Commission.”*

Inside Cover: Move Heritage Preservation Commission above Community Advisory Group

Pages 6, 125, 136, 139, 145, 147, 149, 150, 158: Revise Character Area map boundary between the Gateway District and the Warehouse District.

The current boundary between the Gateway and Warehouse District is currently located is drawn along the rights-of-way for First and Second Avenues North. The boundary should be moved east to Hennepin Avenue to align with the boundary of the Minneapolis Warehouse Historic District and respect the development patterns and character of that district. **Revise:** *Boundary between Gateway and Warehouse Districts moved to Hennepin Avenue.*

Page 41: 5.3.b **Revise:** *remove “public” and “of the neighborhood” to read “The adaptive reuse of railroad corridors and spurs to provide green space, view corridors or other amenity for use and enjoyment is the preferred treatment”,*

Page 51: photo caption **Add:** *“the” to read “A key view is one that is from the public way and looks to a built or natural feature that is widely recognized by the public to be of importance.”*

Page 141: Guideline 10.33 covers building height in the Warehouse District. This should state six stories, not ten stories. This was an error in the document. Six stories is consistent with recent evaluations of land use and development intensity in this area.

Department of Community Planning and Economic Development
Planning Division

Revise: 10.33 to read as follows *“New infill shall be within the range of heights seen historically in the area with a maximum height of six stories.”*

Page 143 Guideline #10.37 **Add** *“i”* to *“stor(i)es”* to read *“New infill shall be within the range of heights that currently exist in the area with a maximum height of six stories”*

Page 155. Revise the last sentence of the third paragraph to read as follows *“Renewed interest in the area in the late 1990s and early 2000s brought additional residential development in the form of townhomes and mid-rise residential buildings.”*

Last Page: Add back cover page.

Department of Community Planning and Economic Development
Planning Division

STAFF RECOMMENDATION:

CPED recommends that the Minneapolis Heritage Preservation Commission **adopt** the staff recommendation and **approve** the St. Anthony Falls Historic District Design Guidelines with the following amendments to the document (listed in page order):

1. Inside Cover: **Revise** “Historic Preservation Commission” should read “Heritage Preservation Commission.”
2. Inside Cover: **Move** the Heritage Preservation Commission above the Community Advisory Group
3. Page 3: **Add:** Checkmark for Archaeological Resources under Chapter 1
Add: Checkmarks for Landscape, Streetscape & Open Space under Chapters 5 and 7
Add: Checkmark for Historic Infrastructure under Chapter 6
4. Pages 6, 125, 136, 139, 145, 147, 149, 150, 158: **Revise:** Boundary between Gateway and Warehouse Districts moved to Hennepin Avenue. Revise maps appropriately.
5. Page 9: **Revise** second sentence under the heading "Deconstruction" to read as follows “This is typically employed when a building is to be relocated or when the materials are to be reused in other building projects.”
6. Page 9: Revise sentences under Demolition to read as follows “Any act or process that destroys, in part or whole, a structure, building or site is considered “demolition.” This is inappropriate for any contributing resource.”
7. Page 13: Add after fourth sentence of “Step 3” “In some cases the proposed use will not be appropriate for the building. Other buildings or sites should be examined for the proposed use.”
8. Page 20 and 21: **Replace** “Ojibwe” with “Ojibwa”
9. Page 25: In the first paragraph, 4th line, Add “a” before “coal-fired”
10. Page 27: **Replace** “Ojibwe” with “Ojibwa”
11. Page 40 **Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for historic infrastructure guidelines specific to each character area.)”
12. Page 41: 5.3.b **Revise:** remove “public” and “of the neighborhood” to read “The adaptive reuse of railroad corridors and spurs to provide green space, view corridors or other amenity for use and enjoyment is the preferred treatment”
13. Page 41: **Revise:** 5.3.c. as follows” The enclosure of rail corridors and spurs in a building is generally inappropriate. However, it will be considered if the design clearly interprets the historic function of the space and it can be demonstrated that site constraints make the reuse of the site not feasible.”
14. Page 47 **Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for streetscape guidelines specific to each character area.)”
15. Page 51: photo caption **Add:** “the” to read “A key view is one that is from the public way and looks to a built or natural feature that is widely recognized by the public to be of importance.”

Department of Community Planning and Economic Development
Planning Division

16. Page 55: **Revise:** 7.9.b to read “Mount a balcony to accentuate historic defining features. The balcony should fit within an existing opening and should not exceed one structural bay in width.”
17. Page 58: **Remove:** “to” in Intent statement between “signage” and “for”
18. Page 60: **Revise:** second to last sentence to read “Upper-story windows are smaller,…”
19. Page 61: **Revise:** add apostrophe to side bar to read as “...the National Park Service’s web site...”
20. Page 63: **Revise:** 8.5.a. to read “Use the gentlest means possible that will achieve the appropriate results. **Remove:** the following from 8.6.a. “(See page 76 for an illustration of a simplified cornice design as an example.)”
21. Page 64: **Revise:** 8.10.b. to read as follows “Remove only those materials which are deteriorated beyond repair and must be replaced.”
22. Page 69: **Revise:** 8.21 to read “Repoint mortar joints only where there is evidence of deterioration.”
23. Page 71: **Revise:** 8.27 to read “When replacing a door, use a design that has appearance similar to original, or one associated with similar buildings of a similar style and age.”
24. Page 72 and 73: **Revise:** 8.31, 8.31.a., 8.3.b., and 8.32.a., replace “kickplate” with “bulkhead”
25. Page 77: **Add:** new 8.38.b-d. as follows
 - b. When considering the replacement of historically significant windows, new windows should be compatible in material, type, style, operation, sashes, size of lights and number of panes of the existing windows in that location.
 - c. True divided lights are required when replacing a divided light window.
 - d. Where true divisions are not possible, applied muntins, with an interstitial spacer will be considered. Applied muntins shall be installed on both sides of the glass.
26. Page 79: **Add:** a new 8.4.c “Historic parapet caps, such as metal, stone, and terra cotta should be retained”
27. Page 81: **Remove:** 8.46.b, **Revise:** 8.46.c to state “*Historic materials and specialty materials such as tiles, metals, and wood should be replaced with a matching material*”
28. Page 81: **Remove:** 8.47 and 8.47.a
29. Page 85: 8.57 **Renumber** ‘8.57 b - f’ as ‘8.57 c – g’.

Add new ‘8.57.b’ to read as follows: “The maximum height of an addition should not exceed 14 feet as measured from the structural roof deck to the existing building.”

Revise: former 8.57.e. to read as follows “The addition is distinguishable as new and is compatible in material and shape.”
30. Page 90 **Add:** the following sentence after the first sentence of the second paragraph on “As such, it may not be appropriate to install some or all technologies on resources within the historic district.”
31. Page 93: **Revise:** 8.63.c. to read as follows “Replace deteriorated glazing compound. Remove deteriorated putty with care.” **Revise:** 8.63.d. to read “On buildings that

Department of Community Planning and Economic Development
Planning Division

historically did not have storm windows, place storm windows internally to avoid altering external appearance.”

32. Page 99: **Add** after second paragraph: “The guidance in this chapter is further refined and applied in Chapter 10: Character Areas. The intent is that these two chapters should be used together.”
33. Page 99: **Add** after last paragraph of Intent Statement “(See Character Areas in Chapter 10 for building placement and orientation guidelines specific to each character area.)”
34. Page 106: **Revise** last sentence of Intent Statement to read “(See Character Areas in Chapter 10 for building mass, scale and height guidelines specific to each character area.)”
35. Page 106: **Add**: the following to the last bullet: “Key views are maintained (see page 51 for more information on key views.)”
36. Page 118: **Revise**: 9.25.b by replacing “mullion” with “muntin”
37. Page 120: **Add**: the following after the first paragraph of the intent statement “Relating to the context, design characteristics and historic development patterns of the subject should be considered first, then the energy efficiency of the design.”
38. Page 133: **Revise**: Building Design to read as follows: “Generally this area is not appropriate for new buildings; however, an interpretive building design concept for this area that enhances educational and preservation goals will be considered.” “Use former development patterns and historic maps for reference in site design and orientation of new structures and buildings.”
39. Page 13: **Revise**: Building Design to read as follows: “Generally this area is not appropriate for new buildings; however, an interpretive building design concept for this area that enhances educational and preservation goals will be considered.” “Use former development patterns and historic maps for reference in site design and orientation of new structures and buildings.”
40. Page 138: **Revise**: 10.24. a- c as follows:
 - 10.24 The maximum building height should not exceed the height of 30 stories.
 - a. High-rise, mid-rise and low-rise building heights are most appropriate (See page 103 for building height classifications.)
 - b. Taller buildings and portions of buildings should be set back from the river corridor edges and historic buildings.
 - c. For high-rise buildings, a low-rise podium is encouraged along the street.
41. Page 141: **Revise**: 10.33 to read as follows “New infill shall be within the range of heights seen historically in the area with a maximum height of six stories.”
42. Page 143: **Add** #10.37 “i” to “stor(i)es” to read “New infill shall be within the range of heights that currently exist in the area with a maximum height of six stories”
43. Page 150: **Revise** 10.48 to read “New infill shall be within the range of heights and widths of historic buildings that currently exist.”
44. Page 155. **Revise** the last sentence of the third paragraph to read as follows “Renewed interest in the area in the late 1990s and early 2000s brought additional residential development in the form of townhomes and mid-rise residential buildings.”
45. Last Page: **Add** back cover page.