



HISTORIC PRESERVATION

The numbered strategies, policies, figures, and pages in the citywide plans of the *Saint Paul Comprehensive Plan* all employ the following abbreviations as a prefix to distinguish among these elements of the other citywide plans:

- IN - introduction;
- LU - Land Use Plan;
- H - Housing Plan;
- HP - Historic Preservation Plan;
- PR - Parks and Recreation Plan;
- T - Transportation Plan;
- W - Water Resources Management Plan; and
- IM - Implementation.

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The following principles inform the strategies, objectives and policies in this chapter:

- Preservation is a core community value.
- Historic preservation is a priority for the City of Saint Paul.
- Preservation is a critical component of neighborhood vitality, quality of life and sense of place.
- Preservation is an essential tool to accomplish economic development.
- Historic resources are unique and irreplaceable, and should be treated accordingly.
- Preservation should be integrated with the broader city and neighborhood planning process, and with other chapters of the Comprehensive Plan.

Introduction

Saint Paul has a wealth of historic resources that define the character of the city, create a strong sense of place, enhance the quality of life of residents, and connect residents to the city. Like many great American cities, Saint Paul has embraced historic preservation as an important tool for maintaining economic and social vitality. During the past 25 years, historic preservation has been used to transform areas such as Lowertown, Cathedral Hill, Rice Park, Selby Avenue, Summit Hill, and Dayton's Bluff. The commitment to these places by residents, the City, and other organizations has led to increased investment and higher property values, and has made these areas better places to live, work, and recreate. Through historic preservation, Saint Paul has remained attractive and vital to those who seek an urban lifestyle.

Saint Paul's preservation ethic is the result of grassroots movements. One of the earliest and most recognizable grassroots preservation efforts in Saint Paul was the successful campaign to save the Old Federal Courts Building from the wrecking ball and rehabilitate it as Landmark Center, which is now an iconic symbol of the city. Saint Paul's commitment to historic preservation is further evidenced by the fact it was one of the first communities in Minnesota to adopt a heritage preservation ordinance and become a Certified Local Government (CLG).

While these early efforts set the stage for preservation in Saint Paul, historic preservation efforts have been hampered by a lack of consistent leadership and supportive City policy. The heritage preservation ordinance has allowed for the preservation of a relatively small number of key historic sites and districts, but there has not always been an organizational structure that consistently makes preservation a priority, sets goals for historic preservation, and establishes broad policies that ensure these goals are achieved.

PURPOSE

The purpose of this plan is to provide a guiding vision for historic preservation in Saint Paul. It formalizes City policy regarding historic preservation, guides public and private investment to further City preservation goals, advocates for historic preservation, and guides the work of the Heritage Preservation Commission (HPC).

HISTORIC PRESERVATION DEFINED

For the purpose of this plan, historic preservation is defined as follows:

Historic preservation is an activity that preserves historic resources, and their ability to communicate their intended meaning and significance. It includes the identification, evaluation, designation, protection and retention of significant architectural, historic and cultural resources in the built and natural environments. Resources can range from small objects, to buildings and structures, to sites and districts, to landscapes and streetscapes, to entire view corridors. By protecting the historic character and fabric of a community, preservation enables the people of today and tomorrow to connect with the people and events that underlie their past. More recently, historic preservation

has become associated with healthy living, sustainability, and green building to support the retention of older buildings, create a strong and unique sense of place, and enhance the quality of life in a community. For the purposes of this plan, heritage preservation is the same as historic preservation.

LEGAL FRAMEWORK

There are a number of federal, state, and local laws that serve as the legal basis for many of the historic preservation activities that take place in Saint Paul. Federal laws include the National Historic Preservation Act of 1966 (NHPA), as amended; the National Environmental Policy Act of 1969 (NEPA), as amended; the Archaeological and Historic Preservation Act of 1974, as amended; the American Indian Religious Freedom Act of 1978, as amended; the Archaeological Resources Protection Act of 1979, as amended; and the Native American Graves Protection and Repatriation Act of 1990, as amended.

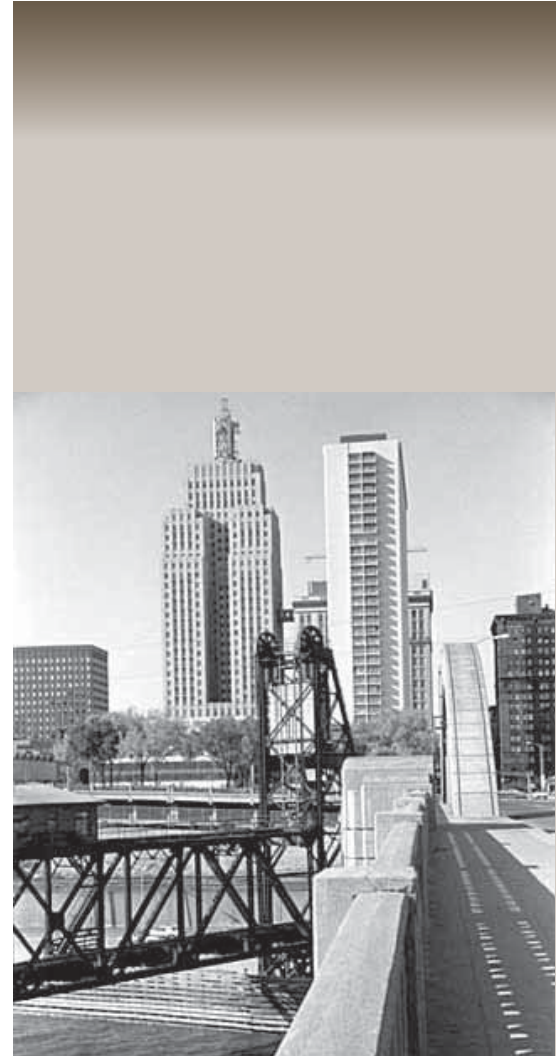
Several State statutes address cultural resources in Minnesota. Many of these laws are found in Minnesota Statutes, Chapter 138, including the Minnesota Field Archaeology Act, the Minnesota Historic Sites Act, and the Minnesota Historic Districts Act. Other State laws relating to preservation and cultural resources include: Section 471.193 Municipal Heritage Preservation, the Minnesota Private Cemeteries Act, and the Minnesota Environmental Rights Act. The Environmental Quality Board also maintains a number of rules pertaining to the protection of cultural resources.

At the local level, the City's Heritage Preservation Ordinance, Chapters 73 and 74 of the Saint Paul Code of Ordinances, enacted in 1976, codified a public purpose and policy for heritage preservation in the city. Chapter 73 established the HPC, defines the powers and duties of the Commission, authorizes the City to designate heritage preservation sites and outlines procedures for designation. It authorizes the HPC to review permits for locally-designated heritage sites, establishes fines for violations of the ordinance, and specifies repositories for documents and the recording of heritage preservation sites. Chapter 74 codifies City-designated historic districts, includes a legal description of each district, and contains design guidelines that must be used to review alterations to properties within a designated district.

BACKGROUND

The modern day historic preservation movement started to gain widespread acceptance in the late 1960s and early 1970s, closely corresponding to the enactment of key Federal and State enabling legislation for historic preservation. In Saint Paul, the first property to be officially recognized was the James J. Hill House, which was designated a National Historic Landmark in 1961. Several properties in Saint Paul were subsequently listed on the National Register of Historic Places (NRHP) and the State Register of Historic Places (SRHP) in the late 1960s and early 1970s. After a number of notable preservation successes, including Landmark Center, the City of Saint Paul enacted a heritage preservation ordinance in 1976. The ordinance includes a declaration of public policy and purpose:

The Council of the City of Saint Paul hereby declares as a matter of public policy that the preservation, protection, perpetuation, and use of areas, places, buildings, structures, and other objects having historical, cultural,



architectural, archaeological, or engineering significance is a public necessity and is required in the interest of the health, prosperity, safety and welfare of the people.

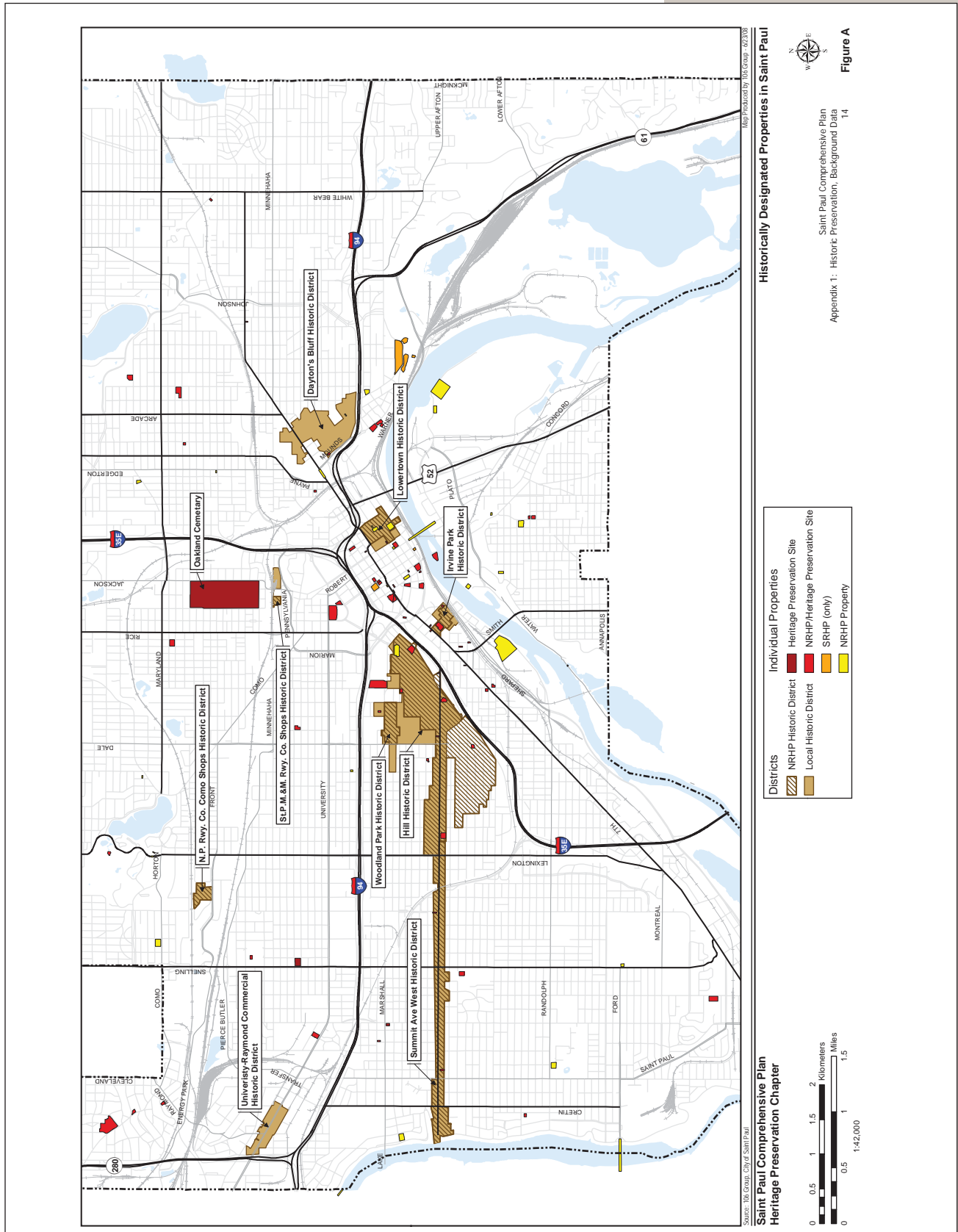
- Safeguard the heritage of the City of Saint Paul by preserving properties which reflect elements of the city's cultural, social, economic, political, architectural, archaeological, or engineering history;
- Protect and enhance the City of Saint Paul's attraction to residents, tourists and visitors, and serve as a support and stimulus to business and industry;
- Enhance the visual and aesthetic character, diversity, and interest of the City of Saint Paul; and
- Foster civic pride in the beauty and notable accomplishments of the past; Promote the use and preservation of historic sites and structures for the education and general welfare of the people of the City of Saint Paul.

Since 1976, this declaration of public policy and purpose has guided the City's historic preservation efforts. Some of the major highlights over the years include the designation of a large number of properties and several districts in Saint Paul as City heritage preservation sites in the 1980s, the completion of a city-wide historic resources survey in 1983, the City becoming a Certified Local Government in 1985, and the renaissance of several historic areas such as Lowertown, Cathedral Hill, and Summit Avenue. As of March 2008, there were three National Historic Landmarks in the city, 86 individual properties, and seven historic districts that have been listed on the NRHP; 11 individual properties and two historic districts that have been historically designated by the State of Minnesota; and 73 individual properties and six historic districts that have been designated as heritage preservation sites by the City of Saint Paul (see Figure HP-A).

During the last decade, the focus of preservation efforts in Saint Paul has started to change. While the number of properties being designated as heritage preservation sites by the City has dropped off considerably, there is a much greater focus on planning for preservation and community education. In this time, two individual properties and one historic district were designated for heritage preservation by the City, and six properties were listed on the NRHP. Perhaps more notable are some of Saint Paul's other preservation achievements, including the creation of Historic Saint Paul in 1998, a non-profit organization created to preserve, protect and enhance the character of Saint Paul neighborhoods, and the development of six historic contexts in 2001. The City participated in the National Trust for Historic Preservation's Preservation Development Initiative in 2002, which brought together a team of local and national experts to assist the City in better utilizing historic preservation as an economic development tool. In 2004, the City installed several historic district marker signs in locally-designated historic districts to raise awareness about them and to benefit heritage tourism efforts. Saint Paul's many successes, as well as its challenges, were showcased to a national audience in 2007, when Saint Paul hosted the National Trust for Historic Preservation's annual National Historic Preservation Conference, the premiere historic preservation conference in the United States. In 2007, the City took a major step forward in planning for historic preservation by initiating work on the first-ever historic preservation plan in the *Saint Paul Comprehensive Plan*.



FIGURE HP-A. MAP OF HISTORICALLY DESIGNATED PROPERTIES IN SAINT PAUL



The demolition and replacement of historic buildings with new construction increases the consumption of natural resources, fills landfills and increases greenhouse gas emissions. For example, a typical 50,000-square-foot commercial building contains about 80 billion British Thermal Units (BTUs) of embodied energy, the energy that went into manufacturing the building materials and constructing the structure.¹ This is the equivalent of 640,000 gallons of gasoline. If the building is demolished, all of this energy is wasted. Moreover, the demolition will generate more than 4,000 tons of waste, which is enough to fill 26 boxcars, or a train that is nearly a quarter mile long.² Since construction debris accounts for 25 percent of the annual municipal waste stream, each building that is preserved can significantly extend the life of a landfill.³ If the demolished building is replaced by new construction, an equivalent amount of energy is required to construct the new building.

Another benefit of preserving historic buildings is an associated reduction of greenhouse gases and reduced energy consumption. More than 43 percent of the carbon emissions in the United States are attributed to the construction and operations of buildings.⁴ One study has determined that the greenhouse gas emissions from renovation projects are 30–50 percent less than an equal investment in new construction.⁵ There is also a common misconception that historic buildings are less energy efficient than new buildings. Several studies have proven this incorrect and have found that historic buildings actually use less energy. A study by the United States Department of Energy indicates that commercial buildings constructed before 1920 use less energy per square foot than buildings from any other decade up until 2000.⁶ Another study found that utility costs for historic buildings are almost 27 percent less than those for non-historic buildings.⁷

KEY TRENDS

Broadening definition of preservation.

When historic preservation started to gain widespread acceptance in the late 1960s and early 1970s, much of the focus was on saving key buildings of national or state significance and architectural landmarks. Today, preservation recognizes the cultural, social, economic, and political history of the city. History is demonstrated not only in the built environment but also in the landscape and in the stories of its citizens and visitors.

Increasing focus on sustainability.

An existing building that was well-built and has been maintained over time is the most “green” building there is. Most historic buildings were designed with features that address today’s pressing sustainability issues, such as large windows that take advantage of natural light, ventilation, and passive solar capabilities. The preservation, rehabilitation, and adaptive reuse of historic buildings support the City’s sustainability goals.

Increasing awareness of our place in history.

As the world continues to change at an ever-increasing rate, preservation can give us perspective on where we are and where we have been. Historic preservation connects the past with the present and the people of today with the people who came before. With increased support for preservation activity, there is a continued need to reach out to the public and educate them about the importance of designating, preserving, and protecting historic resources.

Awareness of economic development as a key tool.

Rehabilitating key resources in neglected and distressed neighborhoods can serve as a catalyst for investment. Downtowns become revitalized, and properties are returned to the tax rolls. While not the “quick fix” that some communities look for, the incremental, property-by-property reinvestment typical of preservation is more economically viable over the long term and will

1 United Nations Environment Programme, “Buildings and Climate Change: Status, Challenge and Opportunities”, 2007, ISBN:978-92-807-2795-1

2 Moe, Richard. Sustainable Stewardship: Berkley, California: Historic Preservation’s Essential Role in Fighting Climate Change. Presented March 27, 2008.

3 Carroon, Jean. Testimony before the United States Senate, Committee on Rules and Administration, hearing on Improving Energy Efficiency, Increasing the Use of Renewable Sources of Energy, and Reducing the Carbon Footprint of the Capitol Complex. June 18, 2008.

4 Pew Center on Global Climate Change. Towards A Climate-Friendly Built Environment. 2005. Available at: http://www.pewclimate.org/global-warming-in-depth/all_reports/buildings

5 Carnegie Mellon Green Design Institute. Carnegie Mellon Green Design Institute Life Cycle Assessment Tool. Available at www.eiolca.net.

6 U.S. Energy Information Agency. Consumption of Gross Energy Intensity for Sum of Major Fuels for Non Mall Buildings. 2003. Available at: http://www.eia.doe.gov/emeu/cbecs2003/detailed_tables2003/2003set9/2003pdf/c3.pdf.

7 Bradley Wolf, Donald Horn, and Constance Ramirez. Financing Historic Federal Buildings: An Analysis of Current Practice. General Services Administration, Washington, D.C. 1999.

likely lead to a more stable local economy. Jobs are created for small business and laborers. Sensitively restored buildings create market value for themselves as well as the buildings and public spaces adjacent to them. Increasingly, quality of life is a critical ingredient in economic development and inter-city competition, and historic preservation is integral to a community's quality of life.

STRATEGIES

Seven strategies will guide future historic preservation efforts in Saint Paul. The remainder of the *Historic Preservation Plan* describes these strategies in more detail and contains policies to implement them.

Be a Leader for Historic Preservation in Saint Paul.

The City must play a broad range of roles in preserving historic resources, as well as raising awareness and educating the public about the history of the city, its historic resources, and the benefits of historic preservation. Policies under this strategy focus on three roles for the City: policy setter, facilitator/convener, and advocate.

Integrate Historic Preservation Planning into the Broader Public Policy, Land Use Planning, and Decision-Making Process of the City.

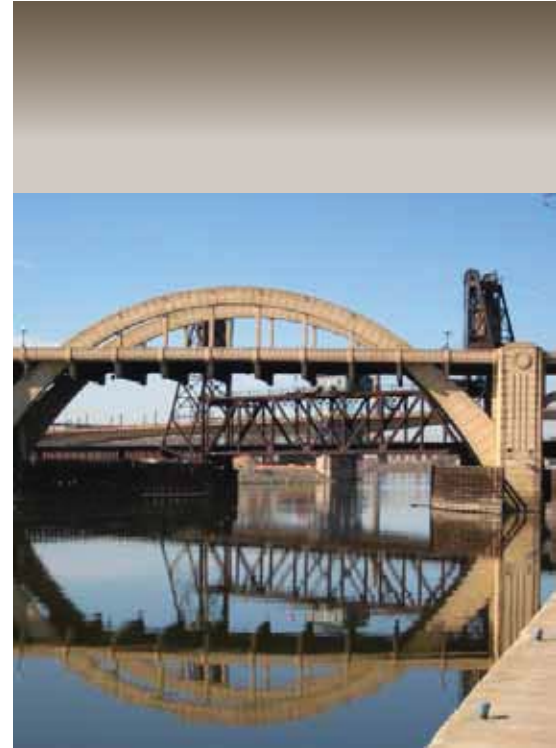
Most City departments, as well as many other public and private entities, are involved with historic preservation in a variety of ways and to varying degrees. Involvement may include planning, regulation, maintenance, facilitation, redevelopment, funding, and education. Policies under this strategy focus on creating a unified and consistent vision for historic preservation, incorporating preservation planning considerations into the broader planning process, and coordinating and aligning preservation activities between departments.

Identify, Evaluate, and Designate Historic Resources.

Historic resources must be identified, studied, and evaluated before decisions can be made regarding their significance, value to the community, and worthiness for preservation. Moreover, previously identified properties may need to be reconsidered and reevaluated as new information comes to light and perspectives change. From a public policy and decision-making perspective, the identification of historic resources is critical to making well-informed decisions and avoiding preservation battles that can erupt when historic resources are threatened. Policies under this strategy focus on how to comprehensively and systematically identify and document historic resources, select properties for heritage preservation designation, and maintain up-to-date and accurate information on historic properties.

Preserve and Protect Historic Resources.

There are a finite number of irreplaceable historic resources in Saint Paul. Historic resources are focal points of the community that create a strong sense of place and instill a sense of pride and ownership in residents of Saint Paul. While there will always be loss over time due to natural disasters and other unforeseen



events, neglect, inappropriate alterations, and purposeful removal are all avoidable conditions. Policies under this strategy focus on how to preserve, protect, and maintain the unique character of Saint Paul's historic resources.

Use Historic Preservation to Further Economic Development and Sustainability.

Historic preservation is a powerful tool for economic development. It creates jobs (in some cases, more than new construction would); stimulates private investment; increases property values; contributes to an enhanced quality of life, sense of community, and neighborhood pride; celebrates a community's "specialness," which helps in maintaining a competitive edge; and provides environmentally sustainable alternatives to new construction. Policies under this strategy focus on ways to utilize historic preservation to bring investment to the city, stimulate neighborhood revitalization, create jobs, increase property values, improve the sustainability of Saint Paul, and make it easier and more cost-effective to complete historic rehabilitation projects.

Preserve Areas with Unique Architectural, Urban, and Spatial Characteristics that Enhance the Character of the Built Environment

Historic preservation plays a critical role in defining the physical and visual character of Saint Paul. It is inextricably linked to community character, quality of life, and the sense of place in neighborhoods and commercial districts throughout the city. Policies under this strategy focus on maintaining and enhancing the traditional urban character and fabric of the city to create distinctive, vibrant places to live, work, and recreate.

Provide Opportunities for Education and Outreach

Historic resources and educational programs play a key role in bringing meaning to a place, yet the public's understanding of preservation and its goals and regulatory requirements varies widely. Policies under this strategy focus on clarifying historic preservation regulations and processes; interpreting historic places to bring greater meaning to them; and reaching out to the public to increase awareness, appreciation, and understanding.



Strategy 1: Be a Leader for Historic Preservation in Saint Paul

Historic preservation is a core community value. Saint Paul is in a unique position to encourage the preservation of historic resources and to maintain the distinct sense of place that is closely tied to the historic features of the city. Through its ability to create policies and develop programs, the City can foster historic preservation and use it as a tool to revitalize neighborhoods and commercial centers. Preservation is a tool to bring economic development to the city while also enhancing the overall historic character of Saint Paul. Historic preservation should also be used as a means for creating an environmentally, economically, and socially sustainable city. Conversely, the City can impede preservation through policies and programs that result in the loss of historic resources, give preference to new construction over adaptive reuse, or require properties to be altered in ways that cause a loss of historic character, thereby changing the fundamental character of historic resources and the entire city. The first approach is preferred. While there are many ways a city and its governance can be a leader and serve as a steward, there are three key areas where the City must take on a leadership role: policy setting, facilitation, and advocacy and stewardship.

CITY AS POLICY SETTER

1.1. Strengthen and update the historic preservation ordinance to reflect modern preservation practices and tools: 🚶🏻

- a. Clarify and expand terms, roles, responsibilities, regulatory controls and processes;
- b. Broaden the declaration of public policy and purpose statement to frame historic preservation within the context of an environmentally, socially, and economically sustainable city;
- c. Expand responsibilities to include timely reviews of proposed demolition of all buildings and structures in the city, a practice often referred to as demolition delay;
- d. Clarify and improve enforcement powers that include interim protection of historic resources during designation and require owners of designated properties to maintain their properties to avoid costly reconstruction and repair or demolition by neglect (often called duty to maintain);
- e. Clarify criteria for the identification, evaluation and designation process; and
- f. Create a preservation “toolkit” comprised of land use incentives for historic preservation, such as historic variances, the transfer of development rights, and a façade easement program to provide incentives that make it easier to preserve and maintain resources designated for heritage preservation.

1.2. Adopt the broadened declaration of public policy and purpose statement in the historic preservation ordinance as part of the Administrative Code (see Introduction: Background). 🚶🏻



1.3. Update ordinances, policies, and other regulations, including the *Saint Paul Zoning Code*, that discourage or disconnect with City goals for historic preservation. 🚶🏿

1.4. Maintain the City's status as a CLG, which means adhering to the agreement established between the State Historic Preservation Office (SHPO) and the City in 1985 (see Appendix HP-A). 🚶🏿

- a. Pursue CLG grants and provide matching funds to carry out City historic preservation activities.

1.5. Strengthen the role of the HPC in all public planning, development and design processes. 🚶🏿

- a. Institutionalize and create a clear, timely process to consider historic preservation interests and concerns in development, land use, and environmental review processes;
- b. Involve the HPC in the creation and review of plans and projects that affect historic resources (see Strategy HP-2);
- c. Allow the HPC to review and comment on projects involving historic resources as part of the capital improvement budget process; and
- d. Work with district councils to engage interested neighborhood parties in broader planning and development issues.

CITY AS FACILITATOR AND CONVENER

1.6. Develop a clearinghouse where information pertaining to historic preservation can be collected and disseminated to City departments and the public. 🚶🏿

- a. Identify and maintain a repository for City records on historic resources, historic preservation projects, and other preservation efforts and activities;
- b. Utilize the City Historic Preservation Officer and Historic Preservation Team to create a central point of collaboration for entities with a stake in historic preservation (see Strategy HP-2);
- c. Develop programs to connect individuals and businesses who want to acquire historic properties with sellers of historic properties;
- d. Further develop the HPC website to include information on historic resources and the history of Saint Paul, the benefits of heritage preservation designation, technical assistance on how to preserve and maintain historic properties, and links to other preservation-related websites; and
- e. Educate City project managers and other development professionals to bring consistency to historic preservation projects for developers working with historic resources.

1.7. Develop partnerships with district councils and preservation organizations to fund and promote preservation initiatives. 🚶🏿



1.8. Pursue intergovernmental agreements with Federal, State, and County agencies to further City preservation goals and better coordinate historic preservation efforts. ✎

- a. Update and develop programmatic agreements with the SHPO and Federal agencies, such as the United States Department of Housing and Urban Development, to streamline the review of federally-funded activities.

CITY AS ADVOCATE

1.9. Maintain City-owned historic resources pursuant to recognized preservation standards (see Strategy HP-4). ✎

- a. Use HPC design guidelines and the Secretary of the Interior's Standards for the Treatment of Historic Properties to guide work on properties designated as heritage preservation sites; use the Secretary of the Interior's Standards for the Treatment of Historic Properties for other historic resources; and
- b. Provide adequate funding for the maintenance, rehabilitation, and restoration of City-owned historic resources, including infrastructure.

1.10. Give equal consideration to historic preservation factors when City action, involvement, or funding is requested or required. ✎

1.11. Give equal consideration to projects with historic preservation factors when reviewing all Capital Improvement Budget funding requests. This may include adding historic preservation as a point category in the scoring process. ✎

All requests for capital improvement funding should consider impacts on historic resources. Projects that adversely affect historic resources should be given lower priority in the funding process.

1.12. Prioritize the retention of designated historic resources (or those determined eligible for historic designation) over demolition when evaluating planning and development projects that require or request City action, involvement, or funding. 🌱

1.13. Designate City-owned properties that include historic resources as a heritage preservation site or historic district prior to sale (see Strategy HP-3). ✎

1.14. Develop programs to educate the public about historic preservation (see Strategy HP-7). ✎





Strategy 2: Integrate Historic Preservation Planning into the Broader Public Policy, Land Use Planning, and Decision-Making Processes of the City

The HPC is often perceived as being responsible for all of the City's historic preservation activities, when in actuality, a wide range of historic preservation activities are conducted by many different departments throughout the City. Currently, many of these efforts are not coordinated. Not only do many departments lack an official preservation policy but there is a disconnect between some City practices and preservation goals. Outdated survey data on historic resources, limited staffing, and competition for funding to preserve City-owned historic resources create additional challenges. The net result of these conditions is mixed. There are many preservation success stories, but there is also the potential to negatively affect historic resources. Improving the standing of historic resources in the planning process will require a multi-faceted approach. There must be a unified vision for historic preservation that is aligned with City preservation policies. Up-to-date information on historic resources needs to be available to decision-makers. Departments need adequate levels of properly trained staff. Coordination between City departments will help ensure that historic resources are fully considered during policy, land use, planning, and decision-making processes.

ALIGNMENT WITH REGULATORY POLICIES, PLANNING PROCESSES AND DEPARTMENTAL GOALS

2.1. Develop, in cooperation with the City Historic Preservation Officer, a preservation policy for each department affecting the built and/or natural environment that incorporates historic preservation into its mission. 🚶🏻

2.2. Incorporate historic preservation considerations into development, land use, and environmental reviews, staying mindful of project timelines. 🌱

State and Federal environmental review regulations require that the impacts of many publicly and privately funded projects on historic resources be assessed. Potential adverse effects to historic resources are to be avoided or mitigated, and preference is to be given to preserving historic resources in a manner that complies with HPC design guidelines or the Secretary of the Interior's Standards for the Treatment of Historic Properties. Planning for projects that use Federal funds, such as road and bridge projects, must consider their impacts on historic resources, including landscapes and corridors, through the Federal Section 106 process of the NHPA (see Appendix HP-A).

The City should consider impacts to historic resources in all public and private planning and development projects that require City involvement, action, or funding. Alternatives should be considered to avoid, minimize, or mitigate potential adverse impacts to historic resources.

2.3. Integrate historic preservation into public policy and planning processes. 🚶

- a. Utilize the results of historic resource surveys to inform planning and decision-making. City departments should conduct surveys to identify historic resources as they prepare plans, design capital projects, and before they perform maintenance. If historic resources are identified, they should be accommodated in planning, design, and maintenance projects; and
- b. Include a historic preservation component, as appropriate, in public and private planning and development documents that require City involvement, action, or funding, including capital improvement plans, small area plans, master plans, development agreements, and development guidelines.

ADEQUATE STAFFING

2.4. Add staff dedicated to preservation activities within PED that will adequately support a comprehensive preservation program. 🚶

2.5. Create a City Historic Preservation Team of representatives from departments whose work affects preservation activities. The team should coordinate the preservation-related goals, policies, and procedures of these departments with those of the HPC. 🚶

2.6. Designate a City Historic Preservation Officer, who meets the *Secretary of the Interior's Professional Qualification Standards*, to serve as the coordinator for all of Saint Paul's historic preservation activities and oversee the efforts of the City Historic Preservation Team. 🚶

2.7. Identify and train staff from appropriate departments to oversee historic preservation responsibilities and select key staff to serve as liaisons to the City Historic Preservation Team. 🚶

Key City staff, including those involved with planning, urban design, economic development, and property management, should be trained on how to meet City historic preservation goals, and comply with Federal, State, and City legislative requirements. Maintenance and construction staff should be trained on how to properly maintain and preserve historic resources.

2.8. Share information between departments via the Historic Preservation Officer and Historic Preservation Team. 🚶

2.9. Seek partnerships with organizations such as Historic Saint Paul, district councils, and community development corporations. 🚶

2.10. Include district councils in planning for historic preservation and in surveying neighborhoods to identify historic resources. 🚶

The Mayor appoints members to the HPC and provides vision for major historic preservation initiatives. The Department of Planning and Economic Development (PED) is responsible for most of the City's historic preservation activities, including staffing and supporting the HPC, design review, and surveying properties for historic designation. PED is also responsible for planning and funding neighborhood development projects, many of which involve historic preservation, including Federal compliance with Section 106 of the NHPA (see Appendix A). The Department of Public Works is responsible for maintaining the City's historic bridges and brick streets, and works with the Minnesota Department of Transportation on transportation projects that affect historic resources. The Real Estate Division of Public Works oversees the maintenance and repair of several historic buildings owned by the City, including City Hall. The Parks and Recreation Division owns and maintains a number of historic buildings, landscapes and parks in several historic districts. The Department of Safety and Inspections (DSI) provides regulatory oversight that impacts historic buildings, including building codes, code enforcement, site plan review and certificate of occupancy.



The term historic resource is used throughout this plan in a broad sense. For purposes of explaining the process of identification, evaluation and designation in Strategy HP-3, the term historic resource will mean an object, structure, building, site, landscape or district that is believed to have historical, cultural, architectural, archaeological or engineering significance and to meet at least one of the criteria for designation as a heritage preservation site or district (see Policy HP-3.1).

Strategy 3: Identify, Evaluate and Designate Historic Resources

Before historic resources can be preserved and interpreted, and their intended meaning conveyed, they must be identified, studied, and evaluated as to their significance and value to the community. This creates a need for accurate information so that decision-makers can make well-informed, rational decisions. Therefore, an up-to-date historic resources inventory is critical. Moreover, an inventory can help avoid last-minute preservation battles that can occur when old buildings and other potentially historic sites are threatened.

ONGOING IDENTIFICATION AND EVALUATION PROGRAM

3.1. Implement an ongoing survey program to identify and evaluate all types of historic resources in Saint Paul, including buildings, structures, objects, archaeological sites, districts, and landscapes (see Appendices HP-A and HP-B). 🚶♂️

The City should identify, through new survey efforts, a full spectrum of properties that have yielded, or may be likely to yield, information important in prehistory or history; are associated with significant events or with an important pattern of cultural, political, economic or social history; are associated with the lives of significant persons or groups; embody the distinctive characteristics of an architectural or engineering type or style, or method of construction; exemplify the work of a master builder, engineer, designer, artist, craftsman, or architect; exemplify a landscape design or development pattern distinguished by innovation, rarity, uniqueness, or quality of design or detail; or contain or are associated with distinctive elements of city identity.

3.2. Continue to develop a data base to capture, store, and maintain information collected on historic resources during surveys. The data base should be compatible with the SHPO's architecture-history and archaeology data bases, the City's Geographic Information system (GIS), and the City permitting system. 🚶♂️

- a. Continue to develop a well- organized survey form and data entry program to expedite surveys and data entry; and
- b. Integrate survey results into the City GIS system; map historic resources.

3.3. Make the results of the survey available to departments, decision-makers, and the public. 🚶♂️

- a. Make survey information and results available to all City departments through the heritage preservation clearinghouse;
- b. Add survey results to the HPC website; and
- c. Publish survey results and provide copies to libraries, district councils, and City departments and make copies available to the public.

3.4. Pursue creative ways to adequately staff and fund the survey program. The steps taken to conduct a survey and how surveys are carried out are outlined in the Secretary of the Interior's Standards for Preservation Planning. 💰

- a. Develop a long-range strategy to adequately fund the survey program; and
- b. Apply for CLG grants to develop historic contexts and partially fund surveys.

HISTORIC CONTEXTS

Historic contexts provide the framework to help determine if a resource is historically significant and worthy of preservation. Historical Contexts:

- Help in the identification, evaluation, designation, and preservation of historic resources;
- Organize vast and diverse historic resources of a community based on thematic associations, geographical areas, and specific time periods; and
- Group together common properties and identify sites for future study and possible designation.

In 2001, the City developed a set of six comprehensive historic contexts based on thematic areas of the city's development that touch on nearly every significant property type commonly found in Saint Paul. Existing contexts include:

- Pioneer Houses: 1854-1880;
- Residential Real Estate Development: 1880-1950;
- Neighborhood Commercial Centers: 1874-1960;
- Downtown Saint Paul: 1849-1975;
- Churches, Synagogues, and Religious Buildings: 1849-1950; and
- Transportation Corridors: 1857-1950.

While these contexts provide a broad framework, the continuation of history and the discovery of previously unknown facets of history have led to the need for additional context work to identify a full spectrum of historic resources in Saint Paul (see Appendix HP-B).

3.5. Utilize existing statewide historic contexts that are relevant to Saint Paul to evaluate properties for potential statewide significance. 🚶

3.6. Continue to develop new and expand existing historic contexts to allow for the continual identification of a full spectrum of historic resources (see Appendix HP-B). 🚶

- a. Implement the recommendations from the 2001 context study; and
- b. Develop the following new historic contexts, with the highest priority on developing historic contexts for the most threatened resource types and areas:



Photo courtesy of the Minnesota Historical Society.

- Saint Paul Parks, Parkways, and Cultural Landscapes;
- Neighborhoods at the Edge of the Walking City;
- Post-WWII Development, Modernism, and Historic Preservation;
- Mississippi River Valley: Navigation and Commerce;
- Immigrant and Ethnic Communities; and
- Resources Types: Multiple Housing Units, Schools, Fire Houses, Early Gas Stations, Automobile Dealerships, and Industrial Buildings.

RECONNAISSANCE SURVEYS

3.7. Identify and evaluate historic resources in Saint Paul systematically and comprehensively (see Appendices HP-A and HP-B). 🚶🏻

A multi-year work plan should be developed to conduct a reconnaissance-level survey of the entire city. The city should be divided into manageable survey areas that can be completed each year. All surveys should follow the standard professional format outlined in *Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* [48 Federal Register 44716-44740] (National Park Service 1983).

- Highest priority should be given to surveying individual potential historic resources whenever the City receives an application to substantially alter or destroy the resource. Another high priority is the survey and identification of historic resources in areas facing development pressure, such as Invest Saint Paul areas and the Central Corridor;
- A medium-high priority should be the survey of City-owned resources, including buildings and structures, bridges and roads, and parks and natural areas;
- Of medium priority is the survey of previously un-surveyed areas and property types;
- A lower, ongoing priority is the survey of properties as they turn 50 years old; and
- The lowest priority should be to reevaluate previously inventoried properties as existing survey information becomes outdated and as new information becomes available. Previously inventoried properties should be resurveyed if they are located in areas that are being surveyed.

3.8. Enter results from survey work and any other new, relevant information into the historic resources data base. 🚶🏻

Demolished buildings should be left in the data base, but recorded as non-extant.

EVALUATION OF HISTORIC RESOURCES

3.9. Evaluate properties based on historic contexts, reconnaissance surveys, and applicable designation criteria to determine their potential significance as well as their potential eligibility for designation as a heritage preservation site by Saint Paul and for listing on the National Register of Historic Places. 🚶🏻



The criteria identified in the Heritage Preservation section of the *Saint Paul Legislative Code* should be used to evaluate potential historic resources to determine their potential eligibility for designation as a heritage site by the City of Saint Paul. The criteria established by the National Park Service should be used to evaluate the significance of potential historic resources to determine their eligibility for listing on the NRHP.

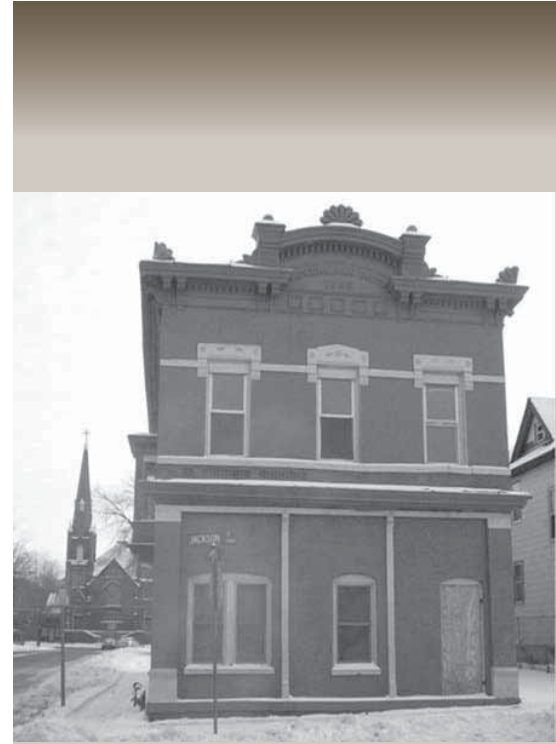
3.10. Forward properties that appear to be potentially eligible for listing on the NRHP to the SHPO for an official determination of eligibility. ✎

DESIGNATION OF HISTORIC RESOURCES

3.11. Make the designation of significant historic resources as heritage preservation sites a priority for the City Council. ✎

- a. Allocate adequate funding and staffing to designate historic resources; and
- b. Prepare designation studies and nominations using City staff or contract historians. It can often take six months to two years to complete a designation study depending on the significance, complexity, and size of the resource (e.g., a single property, a large district, etc.); costs can also vary greatly based on the effort required. Similarly, considerable staff time is required to complete the designation process, including public outreach, meetings and hearings, and preparing reports. Therefore, adequate funding and staffing is critical to a successful designation program.

3.12. Designate historic resources, such as buildings, structures, objects, archaeological sites, historic districts, and landscapes as Saint Paul heritage preservation sites or historic districts. 🌿



There are numerous sites and districts that are worthy of preservation. Since it can take a considerable amount of time and effort to designate a property for heritage preservation, resources should be ranked and prioritized based on significance, physical threats, development pressure, requests from owners, economic importance and financial stability. The highest priority should be given to historic resources that are threatened by destruction or development pressure. Since many areas facing development pressure have not been thoroughly surveyed to identify a full spectrum of historic resources, survey efforts must be aligned with designation priorities to ensure that all unknown historic resources facing development pressure can be properly identified and decisions can be made about designation. The designation of districts should also be a high priority since they can protect entire areas rather than a single property. Medium priority should be given to designating unique or rare historic resource types. Non-threatened properties with completed designation studies should be a low priority.



Before



After

Strategy 4: Preserve and Protect Historic Resources

Given the many benefits associated with preserving historic resources, it must be recognized that there is a finite number of irreplaceable historic resources in Saint Paul. In order to ensure that these limited historic resources retain their ability to convey their meaning and are preserved for future generations to appreciate and enjoy, they must be properly protected.

There are a variety of threats facing historic resources, including demolition by neglect and purposeful destruction; development pressures, such as potential impacts from the Central Corridor light rail (LRT) project on surrounding historic resources; owners who do not properly maintain their buildings; challenges to finding new uses; and even natural disasters. Since historic resources tend to be somewhat unique, there are an equal number of challenges when it comes to preserving them. Consequently, a number of factors need to be considered before selecting a preferred approach to preserving and protecting a historic resource.

DESIGN REVIEW FOR SITES AND DISTRICTS

4.1. Utilize design review controls to protect properties and districts designated for heritage preservation from destruction or alterations that would compromise their ability to convey their historic significance. 🌱

- a. Develop clear and comprehensive design guidelines for newly-designated historic resources;
- b. Revise City design guidelines for historic districts and heritage preservation sites;
- c. Develop one set of general design guidelines, based on the Secretary of the Interior's Standards for the Treatment of Historic Properties, to provide general guidance for all properties and districts designated for heritage preservation. The existing design guidelines for each historic district should be supplemental to the general design guidelines and should be updated to specifically address the unique character and condition of the district. Supplemental design guidelines should be prepared to address the uniqueness of individual designated properties. Design guidelines not only address how to respond to changes and repairs to historic buildings; they also address how new construction, such as additions and new buildings, should be sited and designed to reinforce the historic character of the district; and
- d. Regularly inspect construction after projects are approved by the HPC and permits issued to ensure that the project is being constructed according to HPC approval.

4.2. If archaeological sites are discovered during the construction of City or City-funded projects all work should stop until a licensed, professional archaeologist (American Indians as appropriate) is consulted to develop a course of action before construction work resumes. 🚧

UNDESIGNATED HISTORIC RESOURCES

Only a small percentage of significant historic resources are designated as heritage preservation sites. Currently, significant, but undesignated, historic resources, including properties listed on the NRHP, could be significantly altered or destroyed without consideration by the HPC. Some level of protection should be provided to undesignated historic resources until the HPC has had an opportunity to consider the significance of a property and act to protect it.

4.3. Protect undesignated historic resources. 🚶🏻‍♂️🌿

Protect any undesignated property that is eligible for local designation or listing on the NRHP from destruction or a substantial loss of historic character until the HPC has an opportunity to consider alternatives to adverse effects, or pursue historic designation of the property, and/or find parties interested in acquiring and preserving it (see Strategy HP-1);

- a. Develop a demolition delay clause in the historic preservation ordinance to allow for the consideration of undesignated historic resources during City permitting processes; and
- b. Implement interim protection for historic resources going through the heritage preservation designation process.

CITY-OWNED HISTORIC RESOURCES

4.4. Maintain City-owned historic resources pursuant to recognized preservation standards (see Strategy HP-1). 🚶🏻‍♂️🌿

- a. Use HPC design guidelines and the *Secretary of the Interior's Standards for the Treatment of Historic Properties* to guide work on properties designated as heritage preservation sites and the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for other historic properties determined eligible for designation;
- b. Pursue and provide adequate funding for the maintenance, rehabilitation and restoration of City-owned historic resources, including infrastructure;
- c. Evaluate, preserve, maintain, rehabilitate, or restore, as appropriate, historic properties that are retained by the City; keep these sites open and available to the public; and
- d. Institute standards to document historic properties retained by the City.

4.5. Acquire key threatened historic properties until a suitable owner can be found. 🚶🏻‍♂️🌿

- a. Seek to acquire and preserve key threatened historic resources that embody important historic themes, consistent with broader neighborhood revitalization and economic development goals. As needed, the City should collaborate with Ramsey County, the Minnesota Historical



- Society, community development corporations, and other preservation and community-based organizations to acquire significant historic resources. Acquisition should normally be made with the ultimate goal of transferring ownership to an appropriate new owner, determining a new use, and regulating the design of rehabilitation work; and
- b. Designate, prior to sale, City-owned properties that contain historic resources. (see Strategy HP-3).

Strategy 5: Use Historic Preservation to Further Economic Development and Sustainability

Historic preservation is one of the most important economic development tools available to a community. Seventy-five percent of the top 20 successful (in terms of economic development) cities in the nation are also among the top cities with the greatest amount of historic rehabilitation activity.⁸ Historic preservation benefits a city by strengthening its sense of place and identity, as well as providing amenities and contributing to the long-term sustainability of irreplaceable resources. As an economic development tool, preservation creates jobs, stimulates tourism, increases property values, provides excellent incubator space for businesses, and provides an amenity that helps cities compete with the suburbs. The result is a stronger, more economically sustainable city. While Saint Paul has successfully used historic preservation to transform and revitalize Lowertown, many buildings in Downtown, and numerous successful neighborhood commercial nodes, Saint Paul has yet to take full advantage of the economic development potential of historic preservation.

One of the keys to using historic preservation as an economic development tool is the designation of historic resources. Designation not only opens the door to a number of incentives, such as historic preservation tax credits, but it also provides a measure of neighborhood and community stability. When a historic resource is designated as a heritage preservation site, the associated regulation provides some predictability that improvements will maintain and improve the integrity (and market value) of the site.

In a built-up city like Saint Paul, historic preservation is a greener and more sustainable alternative to major new redevelopment projects, which may require the demolition of existing buildings. Retaining historic buildings saves precious natural resources and energy, avoids filling landfills with used materials, and makes use of historic materials that may be of higher quality than what is available today. Moreover, historic buildings that have been well-maintained are adaptable to a range of new uses. Another added benefit is that most new buildings are designed to be thermally sealed and rely on mechanical systems for heating, cooling, and lighting while historic buildings often have large windows and other features that provide natural light and ventilation.

Saint Paul is fortunate that its building stock has generally not been destroyed by benign neglect or purposeful demolition and has benefitted from foresight by city leaders and citizens. The city has also not been severely affected by inappropriate development. The benefit of this condition is that many historic resources have retained their historic character and now create an opportunity for a tremendous amount of investment that will further strengthen the economic vitality of Saint Paul. The National Trust for Historic Preservation recognized this in 2002, when it named Saint Paul as a demonstration site for



Dollar for dollar, historic preservation is one of the highest job-generating economic development options available to a community. In new construction, the majority of construction costs are for materials, with labor being a much smaller percentage of the total cost. The opposite is true for historic preservation. In historic rehabilitation projects, the majority of construction costs are for labor, with a much smaller percentage going to material costs. As an example, suppose a community is choosing between spending \$1,000,000 in new construction and spending \$1,000,000 in rehabilitation. What would the differences be?

- Rehabilitation projects will initially allow \$120,000 more dollars to stay in the community compared to new construction;
- Rehabilitation will create five to nine more construction jobs than new construction;
- Compared to new construction, rehabilitation will create 4.7 more new jobs elsewhere in the community;
- Household incomes will increase \$107,000 more with rehabilitation than with new construction; and
- Retail sales in the community will increase \$142,000 as a result of that \$1,000,000 of rehabilitation expenditure—\$34,000 more than with \$1,000,000 of new construction.⁹

8 Rypkema, Donovan D. The Economics of Historic Preservation: A Community Leaders Guide. National Trust for Historic Preservation, Washington, D.C. 1994.

9 Rypkema, Donovan D. The Economics of Historic Preservation: A Community Leaders Guide. National Trust for Historic Preservation, Washington, D.C. 1994.



its Preservation Development Initiative (PDI) program. A multi-disciplinary team of City staff and representatives from Historic Saint Paul, community development organizations, and private sector groups and individuals prepared a report, which notes:

Despite an appreciation for historic preservation and obvious examples of its economic value, historic structures and neighborhoods are too often sacrificed in anticipation of greater economic benefit. That willingness to sacrifice the long-term value of stable, attractive, and affordable historic neighborhoods and distinctive landmarks or vistas for short-term 'benefit' undermines Saint Paul's long-term potential. The observations and recommendations contained in the assessment report intend to reorient the City of Saint Paul, private developers and funders, and community development organizations to the greater economic opportunities that historic preservation and a conservation approach can provide.

Policies in this section build upon the recommendations in the PDI report. They focus on ways to bring investment to the city, create jobs, increase property values, make Saint Paul a sustainable city, and make it more beneficial to integrate historic preservation into redevelopment projects.

ECONOMIC VIABILITY OF HISTORIC RESOURCES

5.1. Develop a process and set of criteria to assess the economic viability of historic resources. 💰

One of the most daunting challenges facing historic resources is knowing when and how to best change or intensify their use. Given the role they play in creating a sense of place and enhancing quality of life, it is important that historic resources be redeveloped in a way that allows them to continue these functions while also serving as a catalyst for additional investment in the surrounding area. The City Historic Preservation Team should play a role in this process.

5.2. Develop criteria to objectively determine when economic incentives should be used for the rehabilitation of historic resources. 💰

5.3. Realize the full economic potential of key historic resources. 💰

- a. Rehabilitate key historic resources to serve as a catalyst for additional development in adjacent areas;
- b. Integrate historic properties into new development to strengthen sense of place and provide a link between old and new; and
- c. Develop educational and/or training materials to inform developers of economic development opportunities that are based on historic preservation.

5.4 Invest in historic resources along transit corridors as part of a larger neighborhood revitalization and reinvestment strategy. 🚶🚲💰

LAND USE AND REGULATORY INCENTIVES

5.5. Develop land use and regulatory incentives to make it easier and more feasible to rehabilitate resources designated as heritage preservation sites (see Strategy HP-1). 🌱💰

- a. Develop an ordinance that allows historic use variances in order to alleviate undue hardships created by the historic character of designated properties and is consistent with the authority granted by State statute; and
- b. Explore the use of transfer development rights to alleviate development pressure on historic resources.

5.6. Utilize Chapter 1311 of the *Minnesota State Building Code* to review alterations and changes in use to historic buildings listed on the NRHP or designated as City heritage preservation sites. 🌱

FINANCIAL INCENTIVES

5.7. Partner with Historic Saint Paul to increase its capacity to improve historic resources through its revolving loan program. 💰

Loans could be available for such activities as reuse studies, intervention for threatened historic resources, emergency maintenance and stabilization, and maintenance/rehabilitation for low-to-moderate income homeowners and owners of small businesses.

5.8. Explore the establishment of a City historic preservation fund to address unanticipated needs for historic resources. 💰

Such a fund could provide seed money for a project, temporary/emergency repairs to historic resources, signage or education programs, or other enhancements that have no other funding source.

5.9. Actively promote the use of Federal historic preservation tax credits for the rehabilitation of income-producing properties listed on or determined eligible for listing on the NRHP (see Appendix HP-A). 💰

The City should list historically significant commercial and historic districts on the NRHP so properties in these districts can take advantage of Federal historic preservation tax credits.

5.10. Encourage the use of Federal New Market tax credits in combination with historic preservation tax credits to increase investment in commercial projects in historic resources in low-income areas (see Appendix HP-A). 💰

5.11. Use historic tax credits to encourage affordable housing. 💰

Given the large size of many historic houses and design of many historic warehouse and commercial buildings, historic resources are often good candidates for conversion to housing. The use of affordable housing tax credits,

Historic use variances can be granted by the HPC to allow a historic resource to be used for a purpose that would otherwise not be permitted by the *Saint Paul Zoning Code*, in order to maintain the economic viability of the historic resource.

The transfer of development rights involves conveying the undeveloped floor area from one zoning lot that contains a historic resource to another zoning lot that does not. Transfer development rights eliminate the pressure to remove or significantly alter a historic resource in order to realize the full economic potential of the site, since the “unused” economic potential is transferred to another site that can accept it.

Since the Federal Historic Preservation Tax Incentives Program was established in 1976, more than \$30 billion has been invested in historic rehabilitation projects using these tax credits. In addition, more than half of the states in the United States now offer historic preservation tax credits that have led to significant investment in historic preservation projects and turned many otherwise economically infeasible projects into successful projects.

either alone or with historic preservation tax credits when feasible, greatly improves the economic viability of many historic resources.

5.12. Work with other Minnesota cities to seek State legislation to create a state-wide historic preservation tax credit for properties listed on the NRHP or designated as City heritage preservation sites. \$

5.13. Partner with the Preservation Alliance of Minnesota to expand its façade easement program in Saint Paul. \$

5.14. Pursue the ability to tax designated properties based on their current use rather than their “highest and best” use. \$

5.15. Explore the development of a City property tax abatement program to encourage the rehabilitation of historic resources designated as City heritage preservation sites. \$

Strategy 6: Preserve Areas with Unique Architectural, Urban and Spatial Characteristics that Enhance the Character of the Built Environment

Only a portion of Saint Paul is historically significant and worthy of the level of protection afforded by local designation. However, Saint Paul's traditional urban fabric—its streets, density, placement of houses on residential lots, development along transit corridors, land use patterns (such as small commercial nodes on the edges of neighborhoods), architectural continuity, and walkability—uniquely defines the city and the quality of the urban experience in Saint Paul. Moreover, these features strengthen the social fabric of the city and its neighborhoods by creating an environment where residents can interact.

Preservation of important broad patterns and features of the city requires a different approach than traditional historic preservation practices. The following policies address the preservation of Saint Paul's unique, historic urban form and character in areas not meeting the criteria for local designation.

NEIGHBORHOOD CHARACTER

6.1. Determine the character-defining features of each neighborhood that should be preserved; incorporate these features into area plans and master plans for new development. 🚶

6.2. Increase community awareness about the distinctive features and characteristics of Saint Paul's neighborhoods. 🚶

TRADITIONAL URBAN FABRIC AND FEATURES

6.3. Explore the creation of neighborhood conservation districts. 🌿

In its broadest interpretation, conservation district planning speaks to the idea that the total environment—built and natural—is worthy of understanding and protection. In urban settings, conservation districts usually refer to the delineation of an area with a distinctive appearance, amenity, landscape, architecture, and/or history that does not easily fit into standard historic district frameworks. Neighborhood conservation districts are a tool to recognize and preserve the unique features of an area that, while they define the area's overall character, may not rise to the level of significance required for formal designation. Features and characteristics may include the size, scale, architectural character, and material found on buildings; the rhythm and spacing of structures; general visual character; and infrastructure. In conservation districts, development standards are typically less stringent than the design guidelines for historic districts, and they are customized to protect the unique characteristics of a particular neighborhood.



Photo courtesy of the Minnesota Historical Society.

Form-based coding is a tool to regulate development to achieve a specific urban form. Form-based codes address the relationship between building facades and the public realm, the form and mass of buildings in relation to one another, and the scale and types of streets and blocks. Form-based codes create a predictable public realm primarily by controlling building form, with a lesser focus on land use. They typically contain a regulating plan (showing the locations where building form standards apply), public space standards (for such elements as sidewalks, travel lanes, on-street parking, street trees and street furniture) and building form standards (controlling the configuration, features and functions of buildings that define and shape the public realm). Form-based codes sometimes also include standards relating to architecture, landscaping, signage and environmental features.

6.4. Update the *Saint Paul Zoning Code* to strengthen the traditional character of the city. 🚶

- a. Explore incorporating form-based coding into the *Saint Paul Zoning Code* to encourage the protection and enhancement of traditional neighborhood character.

6.5. Encourage City-funded projects to protect and enhance those neighborhood physical features that define an area's visual character and urban form. 🚶

VISUAL CHARACTER

6.6. Assist neighborhoods in addressing design issues related to the retention and preservation of neighborhood character. 🚶

- a. Partner with appropriate organizations to focus on educating the public on the significance of specific features and characteristics of a neighborhood and how to protect these features through appropriate maintenance and sympathetic alterations; and
- b. Determine where gaps exist in planning and design expertise, and foster the development of new organizations and tools to address these gaps.

6.7. Partner with organizations that support preservation and redevelopment efforts in neighborhood commercial districts and along commercial corridors. 🚶

Because Saint Paul's urban form was created largely by the location of streetcar lines along commercial corridors, the preservation of commercial corridors is particularly important to preserving the overall character of the city. In addition, neighborhood commercial districts are a key feature of Saint Paul's traditional urban neighborhoods. Effort should be made to provide necessary support to the various organizations working to retain and enhance commercial districts and corridors as defining elements of the urban fabric.

Strategy 7: Provide Opportunities for Education and Outreach

Historic resources play an important role in bringing meaning to a place and connecting people to where they live. Public outreach and education are instrumental to raising awareness about historic preservation and its benefits to the City, its residents, and its developers. Utilizing historic resources to convey the history of Saint Paul to residents and visitors will connect people to Saint Paul and make it more desirable. Education is equally important when it comes to understanding the goals and processes of historic preservation.

The HPC already offers a number of programs to educate the public about historic preservation. It has installed historic district identification signs around designated historic districts. The HPC co-sponsors the Annual Saint Paul Heritage Preservation Awards with the American Institute of Architects and oversaw the writing of *St. Paul's Architecture: A History* (University of Minnesota Press, 2006), by Jeffrey A. Hess and Paul Clifford Larson. These efforts, however, are not enough. Education efforts must be more broad in scope. Multiple approaches must be developed to meet the demands of various audiences, ranging from residents who want to learn more about where they live, to tourists who want to experience historic places and sites, to developers who want to know the requirements and procedures for redeveloping historic resources, to City staff who need to make a variety of decisions that will affect historic resources.

THE STORY OF SAINT PAUL

7.1. Develop programs to educate the public about the history of the city. 🚶

- a. Partner with organizations, including the Minnesota Historical Society, Ramsey County Historical Society, Historic Saint Paul, Preservation Alliance of Minnesota, Mississippi National River and Recreation Area, and district councils, to offer guided tours and lectures on the history of Saint Paul;
- b. Develop and partner with organizations to create self-guided walking tour brochures for Downtown and designated historic districts;
- c. Add information about neighborhood histories and historic resources to the HPC website that enables residents and tourists to learn about Saint Paul and develop customized, self-guided tours. Additional information may include an interactive map, designation studies, NRHP nominations, inventory forms, and context studies;
- d. Install interpretative panels as part of City-funded capital and development projects that include historic sites or are the site of significant historic events;
- e. Collaborate with Saint Paul schools to develop education curriculums that teach the history of Saint Paul and help students understand the importance of historic preservation; and
- f. Organize a series of educational forums to inform the general public about existing designated sites and districts and new context studies.





7.2. Identify and mark significant historic resources. 🚶

- Continue to install historic district identification markers as new historic districts are established;
- Provide HPC plaques to individual designated properties; and
- Install historic markers at sites significant to the history of Saint Paul, the State of Minnesota, and the United States.

THE IMPORTANCE OF PRESERVATION

7.3. Educate the public about the importance of designating, preserving, and protecting historic resources. 🚶

- Continue to prepare an annual report, as outlined in the Certified Local Government agreement, to document the historic preservation accomplishments of the City and the HPC (see Strategy HP-1 and Appendix HP-A);
- Continue to sponsor the annual Saint Paul Heritage Preservation Awards;
- Partner with other organizations, such as Historic Saint Paul and district councils, to offer education sessions on historic preservation in neighborhoods;
- Educate property owners on appropriate and affordable methods to maintain historic properties by offering technical information on the HPC website and through more formal educational workshops; and
- Develop promotional materials on incentives for historic preservation in Saint Paul. Information should include the purpose of the program, funding requirements, limitations, and application processes. This information should also be added to the HPC and PED websites, and made available through City departments and district councils.

7.4. Host an annual forum for real estate agents so they can learn how to provide potential buyers of historic resources with accurate information on the property and any potential legal requirements associated with the historic status of the property. 🚶

7.5. Educate City officials and staff about historic preservation. 🚶

- Coordinate efforts by the City Historic Preservation Office to train City staff with the assistance of the City Historic Preservation Team. Training may include the development of technical manuals, lectures and attendance at conferences;
- Educate key City staff about preservation goals and legislative requirements (see Strategy HP-2);
- Educate key City maintenance and construction staff on proper techniques to maintain and preserve historic resources;
- Educate the HPC about its roles, responsibilities, and processes; and
- Train new HPC commissioners on the legal requirements, roles, and responsibilities of the HPC upon their appointment to the HPC. A short refresher course should be held each year and attended by all commissioners.

OWNER EDUCATION

7.6. Improve the process to notify all property owners when their property is being considered for designation, is initially designated, and/or whenever a designated property changes ownership. ✎

The notification should include information on what it means for a property to be designated for heritage preservation. Currently, the Truth-in-Sale of Housing Program requires that buyers of one- and two-family residences be notified if the property they are purchasing is designated. An additional program should be developed to inform all owners and buyers if the property is historically designated.

7.7. Educate property owners and developers about City goals and review processes for historic preservation. ✎

- a. Enhance materials outlining City review and permitting processes for historic resources; and
- b. Create educational materials for developers on the benefits of compatible design and how to design infill development that is compatible with the character of a historic district.

7.8. Make City historic preservation goals, regulations, and guidelines available through the HPC, DSI, and PED websites, as well as through district councils. ✎

Implementation

Resources dedicated to the City's historic preservation program over the past several years have been inadequate. Recognizing that funding for such programs will continue to be limited, the City must be strategic in prioritizing the policies recommended by the *Historic Preservation Plan*. While all of the policies are necessary to maintain an active and effective preservation program, implementation of the following six policies will set the stage for subsequent City preservation efforts.

Revise and strengthen the historic preservation ordinance and adopt a broadened declaration of public policy and purpose statement as part of the Administrative Code.

The ordinance establishes the City's authority to carry out preservation activities. Several changes are recommended to make it consistent with current preservation practice and to better integrate preservation with community vitality and quality of life (see Policies HP-1.1 and HP-1.2)

Create a City Historic Preservation Team of representatives from departments whose work affects and is impacted by preservation activities; develop a preservation policy for each of these departments.

This is a good first step in ensuring that preservation is given equal weight to broader planning and public policy decisions. It will also lay the groundwork for better integration between preservation and planning (see Policies HP-2.1 and HP-2.4).

Survey.

Without a commitment to an on-going survey program, the City will continue to lose important historic resources, and decisions will continue to be made without clear and accurate information (see Policies HP-3.1 through HP-3.4).

Designate.

The ultimate protection from complete or partial loss or alteration of historic resources will not take place until the City Council designates a site or district for heritage preservation. Designation also helps with management of historic resources (see Policies HP-3.11 and HP-3.12).

Develop an annual work plan for the Heritage Preservation Commission that prioritizes survey and designation work and takes into consideration the priorities outlined in Policy HP-3.7.

The work plan should include ways to fund and staff the survey work.

Realize the full economic potential of key historic properties in Saint Paul.

Key properties can serve as a catalyst for additional development in adjacent areas. They can range from a large industrial sites, such as the breweries or 3M, to a small corner commercial building at an old streetcar intersection (see Policy HP-5.3).

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Appendix HP-A

BACKGROUND DATA

Prepared for the City of Saint Paul by the 106 Group Ltd., July 2008

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INTRODUCTION

This Appendix presents background and baseline data. The first section describes the legal basis for preservation as defined by key Federal, State, and local enabling legislation. The next section provides an introduction to historic preservation planning. The following section provides a summary of historically-designated properties in Saint Paul and previous survey efforts. The last section identifies potential funding sources available to government agencies and the private sector to accomplish the City's goals for historic preservation.

A LEGAL BASIS FOR PRESERVATION

Federal Laws

The National Historic Preservation Act of 1966

In 1966, the United States Congress approved and President Johnson signed into law the National Historic Preservation Act (NHPA). Since amended, the NHPA is the Federal enabling legislation for the protection of cultural resources in the United States. Among its accomplishments, it established the National Register of Historic Places (NRHP), the Nation's official list of cultural resources worthy of preservation. It created a State Historic Preservation Office (SHPO) for each state and Tribal Historic Preservation Offices (THPOs) for federally recognized tribes. Section 106 of the NHPA requires Federal agencies to consider the effect of their activities on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) the opportunity to comment on those activities.

Other Federal Laws

There are a number of additional Federal laws that impact preservation efforts in the United States. These laws include the National Environmental Policy Act of 1969 (NEPA), as amended; the Archaeological and Historic Preservation Act of 1974, as amended; the American Indian Religious Freedom Act of 1978, as amended; the Archaeological Resources Protection Act of 1979, as amended; the Abandoned Shipwrecks Act of 1987; and the Native American Graves Protection and Repatriation Act of 1990, as amended.

State Laws

Several State statutes address cultural resources in Minnesota. Many of these laws are found in Minnesota Statutes, Chapter 138, including the Minnesota Field Archaeology Act, the Minnesota Historic Sites Act and the Minnesota Historic Districts Act. Other State laws relating to preservation and cultural resources include: §471.193 Municipal Heritage Preservation, the Minnesota Private Cemeteries Act and the Minnesota Environmental Rights Act (MERA).

The Environmental Quality Board also maintains a number of rules pertaining to the protection of cultural resources.

Minnesota Statutes, Chapter 138: Historical Societies, Sites, Archives, Archaeology, Folklife

Chapter 138 designates the director of the Minnesota Historical Society (MHS) as the State Historic Preservation Officer and places responsibility for Minnesota's historic preservation program with the MHS. Other sections pertain to historic and archaeological resources.

Minnesota Field Archaeology Act

The Minnesota Field Archaeology Act (§138.31-138.42) establishes the office of the State Archaeologist; requires licenses to engage in archaeology on non-Federal public land; establishes ownership, custody, and use of objects and data recovered during survey; and requires State agencies to submit development plans to the State Archaeologist, MHS and the Minnesota Indian Affairs Council for review when there are known or suspected archaeological sites in the area.

Minnesota Historic Sites Act

The Minnesota Historic Sites Act (§138.661-138.669) establishes the State Historic Sites Network (Network) and the State Register of Historic Places (SRHP), and requires that State agencies consult with MHS before undertaking or licensing projects that may affect properties on the Network, the SRHP or the NRHP. In order to be listed on the State Historic Sites Network, a property must be a significant State resource that the MHS is preserving, developing, interpreting and maintaining for public use, benefit and access during open hours. For a property to be listed on the SRHP, it must possess historical, architectural, archaeological and aesthetic values that are of paramount importance in the development of the state and be a site that is not operated by the MHS for historical, interpretive or public use and access purposes.

Minnesota Historic Districts Act

The Minnesota Historic Districts Act (§138.71-138.75) designates certain historic districts throughout the state and includes enabling legislation that allows local governing bodies to create commissions to maintain architectural design review control over these areas.

Other Sections Relevant to Saint Paul

There are two additional sections in Chapter 138 that are worth noting. The first, §138.052, authorizes counties, in this instance Ramsey County, to appropriate County funds or funds from a special county-wide tax levy, to be allocated to the MHS-recognized County historical society for the purpose of promoting historical work in the county. Allowable historical work includes the collection, preservation and publication of historical material, and the dissemination of historical information about the county. The other section, §138.586, authorizes County boards to acquire and maintain tracts of land within the county that are designated as having historical or archaeological significance, and whose acquisition and maintenance are approved by the MHS, and to aid in the construction of markers on such lands.

Minnesota Statute 307.08: Minnesota Private Cemeteries Act

The intent and scope of this act is to give all human burials and human skeletal remains equal treatment and to respect their human dignity irrespective of their ethnic origins, cultural backgrounds or religious affiliations. The provisions of this section protect all human burials or human skeletal remains found on or in public or private lands or waters in Minnesota and makes it a felony to intentionally, willfully or knowingly destroy, mutilate, injure, disturb or remove human skeletal remains or human burial grounds.

Minnesota Statutes, Chapter 15B: Capitol Area Architectural and Planning Board

This chapter established the Capitol Area Architectural and Planning Board (CAAPB) to maintain design review authority over a large area around the State Capitol. The Board is charged with preserving and enhancing the architectural integrity of the Capitol, its grounds and the surrounding area; protecting and enhancing open spaces within the Capitol Area; developing proper approaches to the Capitol Area; and establishing a framework for growth of the Capitol buildings to keep them within the spirit of the original design.

Minnesota Statute 471.193: Municipal Heritage Preservation

This statute, entitled “Municipal Heritage Preservation,” enables local units of government to establish heritage preservation commissions. Since most decisions about land use and buildings are made by local governments, this piece of legislation is one of the most important State laws, as it provides the most comprehensive protection of historic properties.

Minnesota Statute 166B.02: Minnesota Environmental Rights Act

This act declares that each person is entitled by right to the protection, preservation and enhancement of air, water, land and other natural resources located within the state, and that each person has the responsibility to contribute to the protection, preservation and enhancement thereof. Historic resources are included in the definition of natural resources.

The goal of this law is to create and maintain conditions under which human beings and nature can exist in productive harmony, in order that present and future generations may enjoy clean air and water, productive land and other natural resources by providing adequate civil remedy to protect these resources from pollution, impairment or destruction. To accomplish this feat, the Act gives residents and entities of Minnesota the right to a civil suit in order to protect the air, water, land and other natural resources of the state, including historic resources.

Saint Paul

Saint Paul Code of Ordinances, Chapter 73. Heritage Preservation Commission

This ordinance, enacted in 1976, codified a public purpose and policy for heritage preservation in the city. Specifically, it established the Heritage Preservation Commission (HPC), defined the powers and duties of the Commission, authorized the City to designate heritage preservation sites, and outlined procedures for designation. It also authorized the HPC to review permits of locally-designated

heritage sites, established fines for violations of the ordinance, and specified repositories for documents and recording heritage preservation sites.

Saint Paul Code of Ordinances, Chapter 74. Heritage Preservation Districts and Programs

Chapter 74 is a companion ordinance to Chapter 73. Chapter 74 codifies City of Saint Paul designated historic districts, including a legal description of each district and design guidelines that are used to review alterations to property located within the designated historic districts.

AN INTRODUCTION TO PRESERVATION PLANNING

Currently, the only formal relationship between preservation and planning in the City of Saint Paul is a requirement in the heritage preservation ordinance that the Department of Planning and Economic Development notify the HPC of any plans with a preservation component or impact, and consider any comments received from the HPC. Beyond this requirement, which is only occasionally met, the City has no established policies and procedures for preservation planning. While the heritage preservation ordinance outlines some basic regulatory responsibilities and procedures, there is no policy in place to guide the City as it seeks to comply with Federal and State regulations governing the preservation and protection of historic resources. This lack of formally-adopted policy has hindered the ability of City departments to plan for historic resources. Other governmental agencies can serve as models and provide guidance as the City develops its own policies and procedures. The National Park Service (NPS), our nation's steward of historic and cultural resources, has developed well-defined goals, policies and procedures for historic preservation planning that can serve as a model for Saint Paul. The following section is an overview of how the National Park Service suggests developing and implementing historic preservation planning.

The NPS has identified the following goals for preservation planning:

- Integrate historic preservation into the broader public policy, land use planning, and decision-making processes;
- Increase the opportunities for broad-based and diverse public participation in planning and historic preservation activities;
- Expand staff and policy makers' knowledge and skills in preservation planning; and
- Provide maximum flexibility in program administration to enable a community to implement preservation planning programs that meet its specific needs and concerns.

Standards for Preservation Planning

As articulated by the NPS, historic preservation planning is based on the understanding that cultural resources are irreplaceable. Once a cultural resource is lost, it cannot be replaced. While some lost historic resources can be reconstructed, they do not convey the same sense of history and meaning as the original artifact. The goal of preservation planning is to preserve cultural resources before they are lost and to prevent harmful effects to these properties.

Preservation planning is a process that organizes preservation activities in a

logical sequence. The steps include the identification, evaluation, registration and treatment of cultural resources. While a rational order has been defined, in order for preservation planning to be successful and have positive effects, the planning and preservation process must begin before all historic properties have been identified. In addition, preservation planning should have a strong public participation component that allows for diverse opinions to be expressed and for the building of consensus and buy-in for historic preservation.

Preservation planning can occur at several levels or scales: county-wide, in a community, or even for a single site.

Depending on the scale, the planning process will involve different segments of the public and professional communities, and the resulting plan will vary in detail. For example, a city-wide preservation plan will likely have more general recommendations than a plan for a specific site.

Standard 1: Establish Historic Contexts

Before historic properties can be identified and assessed, a framework must be established for their identification.

Decisions about the identification, evaluation, registration and treatment of historic properties are most reliably made when the relationship of individual properties to other similar properties is understood. Information about historic properties representing aspects of history, architecture, archaeology, engineering and culture must be collected and organized to define these relationships. Historic contexts organize information based on a cultural theme and its geographical and chronological limits. Historic contexts describe the significant broad patterns of development in an area that may be represented by historic properties. The development of historic contexts is the foundation for decisions about the identification, evaluation, registration and treatment of historic properties.

Standard 2: Develop Goals and Priorities for the Identification, Evaluation, Registration and Treatment of Historic Properties

A series of preservation goals should be systematically developed for each historic context to ensure that the range of properties representing the important aspects of each historic context is identified, evaluated and treated.

Priorities must be set for all goals identified for each historic context. The goals, with assigned priorities established for each historic context, should then be integrated to produce a comprehensive and consistent set of goals and priorities for all historic contexts in the geographical area of a planning effort, which may range from a specific site to an entire community.

The goals for each historic context may change as new information becomes available. If this is the case, the overall set of goals and priorities may need to be altered.

Activities undertaken to meet the identified goals must be designed to deliver a usable product within a reasonable period of time. Moreover, the scope of activity must be defined so the work can be completed with available budgeted program resources.

Standard 3: The Results of Preservation Planning Are Made Available for Integration into Broader Planning Processes

The preservation of historic resources is one component of the larger planning process. Planning results, including goals and priorities, information about historic properties and any planning documents, must be transmitted in a usable form to those responsible for planning activities, including City departments, the Mayor, City Council and district councils. In order to successfully achieve preservation goals, preservation planning must be integrated into the planning process and project planning at an early stage. To maintain success throughout the city, the results of preservation planning must be made readily available to other governmental planning bodies and to private interests whose activities affect cultural resources.

Secretary of the Interior's Guidelines for Preservation Planning

These guidelines link the *Standards for Preservation Planning* with more specific guidance and technical information. They describe one approach to meeting the *Standards for Preservation Planning*. Agencies, organizations or individuals proposing to approach planning differently may wish to review their approaches with their SHPO or the NPS.

The Guidelines are organized as follows:

- Managing the planning process
- Developing historic contexts
- Developing goals for a historic context
- Integrating individual historic contexts - creating the Preservation Plan
- Coordinating with management frameworks
- Recommending sources of technical information

Managing the Planning Process

The preservation planning process must include an explicit approach to implementation, a provision for review and revision of all elements, and a mechanism for resolving conflicts within the overall set of preservation goals and other land use planning goals. It is recommended that the process and its products be described in public documents.

Implementing the Process

The planning process is continuous. To establish and maintain such a process, however, the process must be divided into manageable segments that can be performed within a defined period, such as a fiscal year or budget cycle. One means of achieving this is to define a period of time during which all of the preliminary steps in the planning process will be completed. These preliminary steps would also include setting a schedule for subsequent activities.

Review and Revision

Planning is a dynamic process. It is expected that the needs for historic contexts as described in Standard 1 above, and the goals and priorities that are developed pursuant to Standard 2, will need to be altered and updated over time as conditions change, new information becomes available, or planning

goals are achieved. The incorporation of new information is essential to improve the content of the plan, and to keep it up-to-date and useful. It is essential that new information be reviewed regularly and systematically, and the plan revised accordingly.

Public Participation

The success of the preservation planning process depends on how well it solicits and integrates the views of various groups. The planning process is directed first toward resolving conflicts in goals for historic preservation, and second toward resolving conflicts between historic preservation goals and other land use planning goals. Public participation is integral to this approach and includes at least the following actions:

- a. Involving historians, architectural historians, archaeologists, historical architects, folklorists and persons from related disciplines to define, review and revise the historic contexts, goals, and priorities;
- b. Involving interested individuals, organizations and communities in the identification of the kinds of historic properties that may exist as well as suitable protective measures;
- c. Involving prospective users of the preservation plan in the definition of issues, goals and priorities;
- d. Providing for coordination with other planning efforts at local, state, regional and national levels, as appropriate; and
- e. Creating mechanisms for identifying and resolving conflicts about historic preservation issues.

The development of historic contexts, for example, should not be limited to a single discipline and should be based on the professional input of all disciplines involved in preservation. For precontact (Native American) archaeology, for example, data from fields such as geology, geomorphology and geography may also be needed. The individuals and organizations to be involved will depend, in part, on those present or interested in the planning area.

Documents Resulting from the Planning Process

In most cases, the planning process produces documents that explain how the process works, and discuss the historic contexts and related goals and priorities. While the process can operate in the absence of these documents, planning documents are important because they are the most effective means of communicating the process and its recommendations to others. Planning documents also record decisions about cultural resources.

As various parts of the planning process are reviewed and revised to reflect current information, related documents must also be updated. Planning documents should be created in a form that can be easily revised. It is also recommended that format, language and organization of any documents or other materials containing preservation planning information meet the needs of prospective users.

Developing Historic Contexts

General Approach

Available information about historic properties must be divided into manageable units before it can be useful for planning purposes. Major decisions about identifying, evaluating, registering and treating cultural resources are most reliably made in the context of other related properties.

A historic context groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archaeology, engineering and culture, and identifies the significant patterns that individual historic properties represent. An example for Saint Paul is Residential Real Estate Development: 1880- 1950. A set of historic contexts is a comprehensive summary of all aspects of the history of the area. Historic contexts are the cornerstone of the planning process, with the goal of identifying, evaluating, registering and treating the full range of properties that represent each historic context.

Identification activities should be organized to include properties representing all aspects of the historic context. The historic context is the framework within which to apply the criteria for evaluation to specific properties or property types. Decisions about treatment of properties are made with the goal of treating the range of properties in the context. The use of historic contexts in organizing major historic preservation activities ensures that those activities result in the preservation of the wide variety of properties that represent our history, rather than only a small, biased sample of properties.

Historic contexts, as theoretical constructs, are linked to actual historic properties through the concept of property types. Property types permit the development of plans for identification, evaluation and treatment, even in the absence of complete knowledge of individual properties.

Historic contexts can be developed at a variety of scales appropriate for neighborhood, city, regional and state planning. Given the probability of historic contexts overlapping in an area, it is important to coordinate the development and use of historic contexts at all levels. Generally, the State Historic Preservation Office possesses the most complete body of information about historic properties and, in practice, is in the best position to perform this function.

The development of historic contexts generally results in documents that describe the historic processes or patterns that define the context. Each of the contexts selected should be developed to the point of identifying important property types. The amount of detail included in these summaries will vary depending on the level (local, state, regional or national) at which the contexts are developed and on their intended uses. For most planning purposes, a synopsis of the written description of the historic context is sufficient.

Creating a Historic Context

Generally, historic contexts should not be constructed so broadly as to include all property types under a single historic context or so narrowly as to contain

only one property type per historic context. The following procedures should be followed in creating a historic context.

1. Identify the concept, time period and geographical limits for the historic context.

Existing information, concepts, theories, models and descriptions should be used as the basis for defining historic contexts. Biases in primary and secondary sources should be identified and accounted for when existing information is used in defining historic contexts.

The identification and description of historic contexts should incorporate contributions from all disciplines involved in historic preservation. The chronological period and geographical area of each historic context should be defined after the conceptual basis is established. However, there may be exceptions, especially in defining prehistoric contexts where drainage systems or physiographic regions often are outlined first. The geographical boundaries for historic contexts should not be based upon contemporary political, project or other contemporary boundaries if those boundaries do not coincide with historical boundaries. For example, boundaries for prehistoric contexts will have little relationship to contemporary city, county or state boundaries.

2. Assemble the existing information about the historic context.

a. Collecting information: Several kinds of information are needed to construct a preservation plan. Information about the history of the area encompassed by the historic context must be collected, including any information about historic properties that have already been identified. Existing survey or inventory entries are an important source of information about historic properties. Other sources may include literature on archaeology, history, architecture and the environment; social and environmental impact assessments; city, regional and state land use plans; architectural and folk life studies and oral histories; ethnographic research; state historic inventories and registers; technical reports prepared for Section 106 or other assessments of historic properties; and direct consultation with individuals and groups.

In addition, organizations and groups that may have important roles in defining historic contexts and values should be identified. In most cases, a range of knowledgeable professionals drawn from the preservation, planning and academic communities will be available to assist in defining contexts and in identifying sources of information. In other cases, however, development of historic contexts may occur in areas whose history or prehistory has not been extensively studied. In these situations, broad general historic contexts should be initially identified using available literature and expertise, with the expectation that the contexts will be revised and subdivided in the future as primary source research and field surveys are conducted. It is also important to identify such sources of information as existing planning data, which are needed to establish goals for identification, evaluation and treatment, and to identify factors that will affect attainment of those goals.

The same approach for obtaining information is not necessarily desirable for all historic contexts. Information should not be gathered without first considering its relative importance to the historic context, the cost and time involved, and

the expertise required to obtain it. In many cases, published sources may be sufficient for writing initial definitions of historic contexts, while archival research or fieldwork may be needed for subsequent activities.

b. Assessing information: All information should be reviewed to identify bias in historic perspective, methodological approach or area of coverage. For example, field surveys for archaeological sites may have ignored historic archaeological sites, or land use plans may have emphasized only development goals.

3. Synthesize information.

The information collected and analysis results should be included in a written narrative of the historic context. This narrative provides a detailed synthesis of the data that have been collected and analyzed. The narrative covers the history of the area from the chosen perspective and identifies important patterns, events, persons or cultural values. In the process of identifying the important patterns, one should consider:

- Trends in area settlement and development, if relevant;
- Aesthetic and artistic values embodied in architecture, construction technology or craftsmanship;
- Research values or problems relevant to the historic context, social and physical sciences and humanities, and cultural interests of local communities, and
- Intangible cultural values of ethnic groups and American Indian peoples.

4. Define property types.

A property type is a grouping of individual properties based on shared physical or associative characteristics. Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate those ideas. Property types defined for each historic context should be directly related to the conceptual basis of the historic context. Property types defined for the historic context “Early Agriculture and River Settlement in Minnesota, 1840-1870” might include farmsteads, building material manufacturing, overland transportation routes, river transportation, town sites, rural facilities, and colleges and universities.

a. Identify property types: The narrative should discuss the kinds of properties expected within the geographical limits of the context and group them into those property types most useful in representing important historic trends. Generally property types should be defined after the historic context has been defined. Property types in common usage (i.e., farm buildings, sawmills, flour mills, roads, or commercial buildings) should not be adopted without verifying their relevance to the historic contexts being used.

b. Characterize the locational patterns of property types: Generalizations about where particular types of properties are likely to be found can serve as a guide for identification and treatment. Generalizations about the distribution of archaeological properties are frequently used. The distribution of other historic properties often can be estimated based on recognizable historical, environmental or cultural factors that determined their location. Locational patterns of property types should be based on models that have an explicit

theoretical or historical basis and can be tested in the field. The model may be the product of historical research and analysis (“Prior to widespread use of steam power, mills were located on rivers and streams able to produce water power”), or it may result from sampling techniques. Often, the results of statistically valid sample surveys can be used to describe the locational patterns of a representative portion of properties belonging to a particular property type. Other surveys can also provide a basis for suggesting locational patterns if a diversity of historic properties was recorded and a variety of environmental zones was inspected. It is likely that the identification of locational patterns will come from a combination of these sources. Expected or predicted locational patterns of property types should be developed with a provision made for their verification.

c. Characterize the current condition of property types: The expected condition of property types should be evaluated to assist in the development of identification, evaluation and treatment strategies, and to help define physical integrity thresholds for various property types. The following should be assessed for each property type:

1. Inherent characteristics of a property type that either contribute to or detract from its physical preservation. For example, a property type commonly constructed of fragile materials is more likely to be deteriorated than a property type constructed of durable materials; structures whose historic functions or design limits the potential for alternative uses (water towers) are less likely to be reused than structures whose design allows a wider variety of other uses (commercial buildings or warehouses).
2. Aspects of the social and natural environment that may affect the preservation or visibility of the property type. For example, community values placed on certain types of properties (e.g., churches, historic cemeteries) may result in their maintenance, while the need to reuse valuable materials may stimulate the disappearance of properties like abandoned houses or barns.
3. It may be most efficient to estimate the condition of property types based on professional knowledge of existing properties and field test these estimates using a small sample of properties representative of each type.

5. Identify informational needs.

Filling gaps in information is an important element of the preservation plan designed for each historic context. Statements of the information needed should be as specific as possible, focusing on the information needed; the historic context and the property types to which it applies; and why the information is needed to perform identification, evaluation or treatment activities.

Developing Goals for a Historic Context

Developing Goals

The purpose of establishing preservation goals is to set forth a “best case” version of how properties in the historic context should be identified, evaluated, registered and treated. Preservation goals should be oriented toward the greatest possible protection of properties in the historic context. They should be

based on the principle that properties should be preserved in place if possible, through affirmative treatments like rehabilitation, stabilization or restoration. Generally, goals will be specific to the historic context and will often be phrased in terms of property types. Some of these goals will be related to information needs that have been previously identified for the historic context. Collectively, the goals for a historic context should be a coherent statement of program direction covering all aspects of the context.

For each goal, a statement should be prepared identifying:

- a. The goal, including the context and property types to which the goal applies and the geographical area in which they are located;
- b. The activities required to achieve the goal;
- c. The most appropriate methods or strategies for carrying out the activities;
- d. Schedule within which the activities should be completed; and
- e. The amount of effort required to accomplish the goal, as well as a way to evaluate progress toward its accomplishment.

Setting Priorities for Goals

Once goals have been developed, they need to be ranked in importance. Ranking involves examining each goal in light of a number of factors:

1. General social, economic, political and environmental conditions and trends affecting (positively and negatively) the identification, evaluation, registration and treatment of property types in the historic context.

Some property types in the historic context may be more threatened by deterioration, land development patterns, contemporary use patterns, or public perceptions of their value. Such property types should be given priority consideration.

2. Major cost or technical considerations affecting the identification, evaluation and treatment of property types in the historic context.

The identification or treatment of some property types may be technically possible but the cost prohibitive; or techniques may not be currently perfected (for example, the identification of submerged sites or objects, or the evaluation of sites containing material for which dating techniques are still being developed).

3. Identification, evaluation, registration and treatment activities previously carried out for property types in the historic context. If a number of properties representing one aspect of a historic context have been recorded or preserved, treatment of additional members of that property type may receive lower priority than treatment of a property type for which no examples have been recorded or preserved. This approach ensures that the focus of recording or preserving all elements of the historic context is retained, rather than limiting activities to preserving properties representing only some aspects of the context.

The result of considering goals in light of these concerns will be a list of refined goals ranked in order of priority.

Integrating Individual Historic Contexts – Creating the Preservation Plan

When historic contexts overlap geographically, competing goals and priorities must be integrated for effective preservation planning. The ranking of goals for each historic context must be reconciled to ensure that recommendations for one context do not contradict those for another. This important step results in an overall set of priorities for several historic contexts and a list of the activities to be performed to achieve the ranked goals. When applied to a specific geographic area, this is the preservation plan for that area.

It is expected that, in many instances, historic contexts will overlap geographically. Overlapping contexts are likely to occur in two combinations—those that were defined at the same scale (i.e., Neighborhood Commercial Centers: 1874-1960 and Transportation Corridors: 1857-1950) and at different scales (i.e., contexts that apply to the entire city and a context that applies to a specific neighborhood, such as Downtown Saint Paul: 1849-1975). Different contexts may cover the same property types, although the shared property types will probably have different levels of importance. Similarly, they may group the same properties into different property types, reflecting either a different scale of analysis or a different historical perspective.

As previously noted, many of the goals formulated for a historic context will focus on the property types defined for that context. Thus, it is critical that the integration of goals include the explicit consideration of the potential for shared property-type membership by individual properties. For example, when the same property types are addressed by two or more contexts, reconciling goals will require weighing the importance assigned to each property type. The degree to which integration of historic contexts must involve reconciling property types may be limited by the coordinated development of historic contexts used at different levels.

Integration with Management Frameworks

Preservation goals and priorities are adapted to land units through integration with other planning concerns. This integration must involve the resolution of conflicts that arise when competing resources occupy the same land base. Successful resolution of these conflicts can often be achieved through the judicious combination of inventory, evaluation and treatment activities. Since historic properties are irreplaceable, these activities should be heavily weighted to discourage the destruction of significant properties and to be compatible with the primary land use.

HISTORIC RESOURCES IN SAINT PAUL

Historically Designated Properties in Saint Paul

In Saint Paul, there are a number of historic designations that can be bestowed on a property, including federal, state and local designation. Each designation carries with it different regulations and responsibilities for both the owner and public agencies. Many of the properties in Saint Paul that are historically designated are subject to one or more types of designation.

National Historic Landmarks

Designation as a National Historic Landmark (NHL) is the highest honor that can be bestowed on an historic place in the United States. NHLs are nationally significant historic places designated by the Secretary of the Interior because they possess exceptional value or quality in illustrating or interpreting the heritage of the United States. Of the fewer than 2,500 NHLs in the United States, three are located in Saint Paul (Figure HP-B).

National Register of Historic Places

The NRHP is the nation's official list of cultural resources worthy of preservation. Authorized under the NHPA and administered by the NPS, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archaeological resources. Properties listed in the NRHP include districts, sites, buildings, structures and objects that are significant in American history, architecture, archaeology, engineering and culture. The first property in Saint Paul to be listed on the NRHP was the James. J. Hill House in 1966. In the ensuing four decades, nearly 100 properties, including the three NHLs, and seven historic districts in Saint Paul have been listed on the NRHP (Figure HP-A).

State Historic Districts and State Register of Historic Places

Since the enactment of State Historic District Act in 1971 and the Historic Sites Act in 1993, two historic districts in Saint Paul have been designated as state historic districts (Figure HP-B). In addition, three MHS-owned properties have been added to the State Historic Sites Network, and ten properties have been placed on the SRHP (Figure HP-B).

Local Landmark Designation

Since the establishment of the HPC in 1976, 73 individual properties and six historic districts have been designated as heritage preservation sites by the City of Saint Paul (Figure HP-B). Many of these properties are also listed on the NRHP.

Inventoried Properties and Previous Survey Efforts

The first comprehensive survey of historic sites in Saint Paul was conducted over a three-year period, 1980-1983. During this survey, more than 5,400 properties were inventoried in Ramsey County, with the overwhelming majority located in Saint Paul. Since 1983, a number of project-specific cultural resource surveys have been completed in Saint Paul. As of December 2007, there were 6,108 properties in Saint Paul in the SHPO architectural data base, including properties that are already listed on the NRHP. In addition, there are 41 known archaeological sites in Saint Paul that appear in the SHPO data base for archaeology.

FIGURE HP-B. TABLE OF HISTORICALLY DESIGNATED PROPERTIES IN SAINT PAUL

Resource Name	Address	NHL	NRHP	State	Local
Dayton's Bluff Historic District	Roughly bounded by Mounds Blvd. to Pine, E. 7 th St. to Maple, North St. to Maria, Maury St., Greenbrier, Beech St., Hope and Arcade to, Conway to Bates, Euclid and Maple				1992
Historic Hill District (local)	Roughly bounded by Irvine, Grand, Oakland, Summit, Lexington, Portland, Dale, Dayton to Grotto, and Marshall			1973, 1974	1980, 1985, 1988, 1991
• Historic Hill District (NRHP)	Irregular pattern from Pleasant and Grand Aves. to Holly and Marshall Aves., from Lexington Pkwy. to 4th and Pleasant		1976		
• Woodland Park District	Roughly bounded by Marshall and Selby Aves., Arundel and Dale Sts.		1978		
Irvine Park Historic District	Roughly bounded by Irvine Park, W. 7 th , Walnut, and Sherman		1973	1974	1982
Lowertown Historic District	Roughly bound by Kellogg Blvd., Jackson, 7th and Broadway Sts.		1983		1984
Northern Pacific Railway Company Como Shops Historic District	Energy Park Dr. and Bandanna Blvd.		1983		
• Paint Shop	1010-1012 W. Bandana Blvd.				1985
• Paint Shop	1020 W. Bandana Blvd.				1985
• New Car Shop	1021 E. Bandana Blvd.				1985
• Blacksmith Shop	1217 N. Bandana Blvd.				1985
• Car Shop	1295 N. Bandana Blvd.				1985
St. Paul, Minneapolis, & Manitoba Railway Company Shops Historic District (Jackson Street Shops)	23-27 Empire Dr. (Jackson St. and Pennsylvania Ave.)		1987		1985
West Summit Avenue Historic District	Summit Ave. between Lexington Pkwy. and Mississippi R. Blvd.		1993		1990
University-Raymond Historic District	Roughly University Ave. from Hampden Ave. to Hwy. 280				2005
Commerce Building	10 E. 4 th St.		2007		
Endicott/Midwest Building	141-143 E. 4 th St.		1974		1979
St. Paul Union Depot	214 E. 4 th St.		1974		
St. Paul Public/James J. Hill Reference Library	76, 80-90 W. 4 th St.		1975		1979
Muench, Adolf, House	653 E. 5 th St.		1975		1979
Germania Bank Building (Saint Paul Building)	4-6 W. 5 th St.		1977		1979
Old Federal Courts Building (Landmark Center)	75 W. 5 th St. (109 W. 5 th St.)		1969	1973	1979
Messerli House	1216 E. 7 th St.				1995
Seventh Street Improvement Arches	E. 7 th St. over Burlington Northern Santa right-of-way		1989		
Mickey's Diner	36 W. 7 th St. (36 Old W. 9 th St.)		1983		1984
Church of the Assumption--Catholic	51 W. 7 th St. (51 Old W. 9 th St.)		1975		1980
Smith Building	225-229 W. 7 th St.				1995
Ramsey, Justus, Stone House	252 W. 7 th St.		1975		1978
Rochat-Louise-Sauerwein Block	261-277 W. 7 th St.		1980		1979
Walsh Building (Walsh Block)	189-191 E. 8 th St. (189-191 Old E. 7 th St.)		1989		1984

FIGURE HP-B. TABLE OF HISTORICALLY DESIGNATED PROPERTIES IN SAINT PAUL (CONTINUED)

Resource Name	Address	NHL	NRHP	State	Local
Como Park Conservatory	1325 Aida Pl. (Como Park)		1974		1979
Schneider, Charles W., House	1750 E. Ames Pl.		1984		1985
Minnesota State Capitol	Aurora Between Cedar and Park Sts.		1972	1971	
Holman Field Administration Building	644 Bayfield St.		1991		
Riverside Hangar	690 Bayfield St.		2007		
Hinkel, Jacob, House	531 Brainerd Ave.		1978		
Central Presbyterian Church	500 Cedar St.		1983		1994
Minnesota Historical Society Building	690 Cedar St.		1973	1974	
Pilgrim Baptist Church	732 W. Central Ave.		1991		
Salvation Army Women's Home and Hospital	1471 Como Ave.		1983		
St. Anthony Park Branch Library	2245 Como Ave.		1984		1985
Muskego Church (Norway Lutheran Church)	2375 Como Ave.		1975		1978
United Church Seminary	2481 Como Ave.		1985		
Davern, William and Catherine, Farm House	1173 Davern St.		1983		1985
Armstrong, John M., House (Armstrong-Quinlan House)	225 Eagle Pkwy. (moved from 233-235 W. 5 th St.)		1983		1982
St. Agatha's Conservatory of Music and Arts	26 E. Exchange St.		1989		1995
Ramsey, Alexander, House	265 S. Exchange St.		1969	1965	1979
Assumption School	68 W. Exchange St.		1975		1980
Kellogg, Frank B., House	633 Fairmount Ave.	1976	1974	1976	1979
Bullard, Casiville, House	1282 Folsom St.		1997		
Intercity Bridge	Ford Pkwy. over Mississippi River		1989		
Riverview Branch Library	1 E. George St.		1984		1985
Rau/Strong House	2 E. George St.		1975		1985
Church of St. Bernard--Catholic	197 W. Geranium Ave.		1983		1985
Brings, Joseph, House	178 Goodrich Ave. (moved from 314 N. Smith Ave.)				1981/ 1989
Burbank Rowhouse	277-283 Goodrich Ave.				1995
Old Main, Macalester College	1600 Grand Ave. (100 Macalester St.)		1977		1978
Arlington Hills Branch Library	1105 Greenbrier St.		1984		1985
Old Main, Hamline University (University Hall)	1536 Hewitt Ave.		1977		1978
Highland Park Tower	1570 Highland Pkwy.		1986		
Vienna and Earl Apartment Buildings	682-688 Holly Ave.		1984		1985
St. Matthew's School	497 Humboldt Ave. (7 W. Robie St.)		1984		
Luckert, David, House	480 Iglehart St.		1975		1979
Hall, S. Edward, House	996 Iglehart Ave.		1991		
Triune Masonic Temple	1898 Iglehart Ave.		1980		1985
Yoerg, Anthony, Sr., House	215 W. Isabel St.		1989		
Gillette Hospital West Wing	1003 E. Ivy Ave. (987 E. Ivy Ave.)				1980
Merchants National Bank (McColl Building)	366-368 Jackson St.		1974		1979
Oakland Cemetery	925-927 Jackson St.				1992
Church of St. Casimir--Catholic	937 E. Jessamine Ave.		1983		1985
Lee, Olaf, House	955 N. Jessie St.		1984		
St. Paul City Hall and Ramsey County Courthouse	15 W. Kellogg Blvd.		1983		1979
Brunson, Benjamin, House	485 Kenny Rd.		1975		1979
Church of St. Agnes--Catholic	548 Lafond Ave.		1980		1985

FIGURE HP-B. TABLE OF HISTORICALLY DESIGNATED PROPERTIES IN SAINT PAUL (CONTINUED)

Resource Name	Address	NHL	NRHP	State	Local
Hamline Recreation Center	1564 Lafond Ave.				1992
Bridges No. L-5853 and 92247	Lexington Ave. in Como Park		1989		
St. Joseph's Academy	355 Marshall Ave.		1975		1979
Thompson, Charles, Memorial Hall	1824 Marshall Ave.				1995
Weber, Catherine and Martin House	202 McBoal St.				1995
C.S.P.S. Hall	381-383 Michigan St.		1977		1978
Lock and Dam No. 2	Mississippi River, north of Marshall Ave.		2003		
Brooks, Edward, Sr. and Markell, House	176 N. Mississippi River Blvd.		2000		
Giesen-Hauser House	827 Mound St.		1983		
Spangenberg, Frederick, House	375 Mt. Curve Blvd.		1976		1979
St. Paul Municipal Grain Terminal	266 Old Shepard Rd.		2004		
Payne Avenue State Bank	965 Payne Ave.		2007		
Jackson Street Railroad Shops	193 Pennsylvania Ave.				1985
German Presbyterian Bethlehem Church	311 Ramsey St.				1980
Derham Hall and Our Lady of Victory Chapel, College of St. Catherine	2004 Randolph Ave.		1985		
Pioneer Building	332-352 N. Robert St.		1974		1979
Manhattan (Empire) Building	360 N. Robert St.		1988		
Robert Street Bridge	Robert St. over Mississippi River		1989		
McGill, Andrew R., House	2203 Scudder Ave.		1974		1979
St. Paul Women's City Club	305 St. Peter St.		1982		1979
Hamm Building	408 St. Peter St.		1997		
Coney Island	444-448 St. Peter St.				1999
St. Paul Cathedral-Catholic	239 Selby Ave. (Summit Ave. at Shelby Ave.)		1974		
Hill, James J., House	240 Summit Ave.	1961	1966	1965	1979
Burbank-Livingston-Griggs House	432 Summit Ave.		1970		1979
Fitzgerald, F. Scott, House (Summit Terrace)	587-601 Summit Ave.	1971	1971	1973	1979
Irvine, Horace Hills, House (Governor's House)	1006 Summit Ave.		1974		1979
Butler, Pierce and Walter, House	1345-1347 Summit Ave.		1982		1985
Beebe, Dr. Ward, House	2022 Summit Ave.		1977		1979
Iris Park Place (A.J. Krank Mfg. Co.)	1855 W. University Ave.		1983		1985
Fitzpatrick Building	465--467 N. Wabasha St.		1990		
Minnesota Boat Club Boathouse on Raspberry Island	1 S. Wabasha St.		1982		1985
Colorado Street Bridge	E side of S. Wabasha St. near Terrace Park		1990		
Finch, Vanslyck and McConville Dry Goods Company Building	366 Wacouta St.		1982		
First Baptist Church of St. Paul	499 Wacouta St.		1983		1979
Harriet Island Pavilion	75 Water St.		1992		
Mendota Road Bridge	Water St. over Pickerel Lake Outlet		1989		
Blair Flats	165 Western Ave.		1975		1979
Lauer Flats	226 Western Ave.		1975		1978
Schornstein Grocery and Saloon	707 E. Wilson Ave. and 223 N. Bates Ave.		1984		
Carvers Cave	Mississippi Riverfront			1965	
Chapel of St. Paul Site	Kellogg Blvd. and Minnesota St.			1965	
Indian Mounds Park Site	Mounds Boulevard			1965	
Old State Capitol Site	Central Business District			1965	

Future Survey Efforts

The 1980-1983 historic sites survey identified more than 5,400 properties and provided a good baseline for historic sites in Saint Paul. The results from this survey are now more than a quarter century old and are out-of-date due to the alteration and demolition of properties over time. In addition, there is an entire generation of properties that are now more than 50 years old that were not previously considered. While additional project-specific cultural resource surveys have been completed over the years, the lack of a coordinated, on-going survey has resulted in large gaps and vastly outdated information on previously-identified properties.

Saint Paul encompasses a large geographic area, with a diverse geological and ecological character. The city has a complex pattern of development with a unique ethnic, social, political and economic history. Given these complexities and the large geographic area encompassed by the city, it can be difficult to identify and evaluate historic resources. In order to better manage this process and to obtain more predictable and consistent results, Saint Paul should consider the multi-step preservation planning process developed by the NPS to systematically identify and evaluate cultural resources. If these steps are followed, Saint Paul will be able to develop and maintain an accurate and up-to-date inventory of historic properties in the city.

The first step in this process is the development of historic contexts. The SHPO and the HPC have already developed a number of statewide and local contexts that apply to Saint Paul, and additional contexts are recommended in Appendix HP-B.

The next step in the identification of historic resources is a reconnaissance level survey, also known as a Phase I survey. During this type of “windshield survey,” large areas are covered to identify known cultural resources and potential resources that require additional study. The 1980-1983 city-wide survey is an example of this type of survey.

In an intensive survey, properties are studied at a more in-depth level. Also known as a Phase II, this is the third step in the identification of cultural resources. During this type of survey, properties are more thoroughly researched and documented. For archaeological sites, test holes are dug. The goal of an intensive level survey is to determine whether or not a property or properties are eligible for listing on the NRHP or for designation as a heritage site by the City of Saint Paul.

The final step in this process is the actual designation of a property or an entire area. Properties can be listed on the NRHP and/or locally designated by the City pursuant to Chapter 73 of the Saint Paul Code of ordinances.

FUNDING FOR HISTORIC PRESERVATION

There are a variety of ways to fund preservation projects in Saint Paul. Funding sources vary based on the type, size and scope of the project, as well as on the entity completing the project - local, state, or federal agency; non-profit organization; or private company or individual.

Federal Programs

Certified Local Government Grants

The Certified Local Government (CLG) program is a nationwide program that helps local units of government advance preservation efforts in their jurisdictions. A city, county or township with a qualifying heritage preservation ordinance and an active HPC can apply to the Minnesota SHPO to become a CLG. Currently there are 37 CLGs in Minnesota, including the City of Saint Paul.

In order to maintain its status as a CLG, the City of Saint Paul must meet the following requirements:

- Maintain its qualified HPC pursuant to state and local legislation;
- Maintain a system for the survey and inventory of historic properties;
- Enforce appropriate State and local legislation for the designation and protection of historic properties;
- Provide for adequate public participation in local historic preservation programs, including the process of
- Recommending properties for nomination to the NRHP;
- Perform other agreed-upon functions delegated by the SHPO; and
- Satisfactorily perform the responsibilities listed in the points above and other specifically agreed-upon functions delegated to the City by the SHPO, including the preparation of an annual report to document the fulfillment of these responsibilities.

The benefit for a city to acquire and maintain its status as a CLG is that the municipality is then qualified to apply for Federal matching grants for a variety of preservation projects. Eligible projects may include, but are not limited to:

- Historic preservation plans
- Historic contexts
- Historic resource surveys
- Local landmark and NRHP nominations
- Building reuse studies
- Cultural landscape inventories
- Design guidelines
- Public education

CLG grants cannot be used for capital improvement (“bricks and mortar”) projects. Priority is given to projects that:

- Reflect goals and strategies of the statewide preservation plan;
- Promote sound preservation planning through historic context development, and completion of historic and
- Archaeological surveys;
- Result in the local designation of landmarks and historic districts; and
- Involve properties associated with the history of under-documented groups or communities.

Funding for the CLG grant program comes from the Historic Preservation Fund, appropriated annually by the United States Congress, and distributed to SHPOs

in all 50 states. Federal regulations require that each SHPO must distribute at least ten percent of its annual allocation to CLGs.

Community Development Block Grant Program

The Community Development Block Grant Program (CDBG) is a federal program administered by the United States Department of Housing and Urban Development (HUD). Since 1974, this long-standing, highly flexible and important program has provided communities with resources to address a wide array of serious challenges and unique community development needs. The objectives of this program are to provide decent affordable housing and services to low and moderate-income persons in the community, and to create jobs through the expansion and retention of businesses.

The CDBG program provides annual grants on a formula basis to 1,180 general units of local government and states. HUD determines the amount of each grant by using a formula comprising several measures of community need, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas.

Historic preservation and heritage tourism are among the many activities supported by CDBG. However, all CDBG-assisted activities must meet at least one of the national objectives outlined in 24 CFR 570.208 for Entitlement programs and 24 CFR 570.483 for State programs. Among the most prominent categories are:

- Planning
- Historic preservation
- Economic development
- Administration
- Engineering and design
- Acquisition
- Clearance
- Site preparation
- Property rehabilitation
- Property disposition
- Code enforcement
- Public facilities and improvements
- Removal of architectural barriers
- Activities by community-based development organizations
- Technical assistance
- Consultant services
- Payment of non-Federal share required in connection with a federal grant-in-aid program

Federal Transportation Enhancement Programs

For nearly two decades, the Federal government has offered a series of Federal transportation programs that have supported transportation-related historic preservation projects. These programs have included the Transportation Equity Act for the 21st Century (TEA-21); the Intermodal Surface Transportation Efficiency Act (ISTEA); and now the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFTEA-LU). In a 15-year period between 1991 and 2005, more than \$2 billion in Federal-aid highway funds has

been allocated to thousands of transportation-related historic preservation projects throughout the country. These programs have been used for projects as diverse as preserving abandoned railroad roadbeds for use as trails; rehabilitating historic highways, bridges, and buildings; and integrating historic properties into new transportation-related developments. Historic resources have also benefited from transportation enhancement money for landscaping, land acquisition and streetscapes in historic commercial districts.

Federal Transit Enhancement Programs

Both TEA-21 and SAFTEA-LU require that one percent of Federal mass transit funding in urbanized areas with a population of more than 200,000 be set aside for transit enhancements. Transit enhancement funding is available from the Federal Transit Administration (FTA) for designated public bodies representing urbanized areas with populations over 200,000. The funding is part of the Urbanized Area Formula Program of the FTA. In fiscal year 2001, over \$8 million from this program was obligated for historic mass transit buildings. Eligible enhancements include historic preservation, rehabilitation and operation of historic mass transportation buildings, structures and facilities (including historic bus and railroad facilities). Projects must be designed to enhance mass transportation service or use, and be physically or functionally related to transit facilities.

Federal Investment Tax Credits

One of the ways the Federal government encourages the preservation of historic buildings is through Federal tax laws that benefit qualifying historic preservation projects.

The Federal Historic Preservation Tax Incentives program offers a 20% tax credit for the rehabilitation of incomeproducing historic structures listed on the NRHP, and a 10% tax credit for all buildings constructed before 1936. A project may qualify for a 20-percent investment tax credit if:

- It involves rehabilitation of a certified historic building used for income-producing purposes;
- The rehabilitation work follows the Secretary of the Interior's Standards for Rehabilitation; and
- The project receives preliminary and final approval from the National Park Service.

Since 1976, the NPS has administered the program in partnership with the Internal Revenue Service (IRS) and SHPOs. Over the last three decades, this program has proven itself to be one of the nation's most successful and cost-effective community revitalization programs, having leveraged more than \$30 billion in private investment to rehabilitate tens of thousands of historic buildings, both large and small, into rental housing, offices and retail stores. As a result of the Federal Historic Preservation Tax Incentives program, abandoned or under-used schools, warehouses, factories, churches, retail stores, apartments, hotels, houses and offices in cities and towns across the country have been restored in a manner that retains their historic character and reinvigorates the community. The program also helped to create moderate and low-income housing in historic buildings.

The Federal historic preservation tax credits can also be combined with other incentive programs, such as low-income housing credits and the New Markets Tax Credit, to create an even greater incentive to rehabilitate historic buildings.

Property owners, developers and architects must apply for the tax credit through the Minnesota SHPO and are encouraged to work with SHPO staff to ensure that appropriate rehabilitation measures are followed. The SHPO then passes its recommendations on to the NPS for approval, which then authorizes the IRS to issue the credit.

Save America's Treasures

The Save America's Treasures (SAT) program was established in 1998 by Executive Order. The program is a public-private partnership between the National Trust for Historic Preservation (NTHP), the NPS, the President's Committee on the Arts and Humanities, and other Federal agencies that are dedicated to the preservation and celebration of America's priceless historic legacy. SAT works to recognize and rescue the enduring symbols of American tradition that define us as a nation by focusing public attention on the importance of our nation's heritage and the need to save our endangered treasures.

Every year, the SAT program awards Federal challenge grants to eligible historic resources to help fund preservation and/or conservation work on nationally-significant intellectual and cultural artifacts and nationally-significant historic structures and sites. Eligible applicants include non-profit, tax-exempt 501(c) organizations, units of State or local government, and Federally-recognized American Indian tribes. Grants are awarded through a competitive process and require a dollar-for-dollar, non-Federal match. The minimum grant request for collections projects is \$25,000 Federal share; the minimum grant request for historic property projects is \$125,000 Federal share. The maximum grant request for all projects is \$700,000 Federal share.

Preserve America

Established in 2003 by Executive Order 13287, the Preserve America program is a White House initiative developed in cooperation with the ACHP, the Department of the Interior and other Federal agencies. It establishes Federal policy to provide leadership in preserving America's heritage by actively advancing the protection, enhancement and contemporary use of the historic properties owned by the Federal government.

The order also encourages agencies to seek partnerships with State, tribal and local governments and the private sector to make more efficient and informed use of these resources for economic development and other recognized public benefits. In addition, it directs the Secretary of Commerce, working with other agencies, to use existing authorities and resources to assist in the development of local and regional heritage tourism.

Each year, subject to Congressional funding, the *Preserve America* program awards grants to designated Preserve America communities. The grants support a variety of activities related to heritage tourism, and innovative approaches to the use of historic properties as educational and economic assets. These grants go beyond the bricks and mortar grants available through the SAT program. Eligible recipients for these matching (50/50) grants include SHPO,

THPOs, designated Preserve America Communities, and CLGs that are applying for Preserve America Community designation. Individual grants range from \$20,000 to \$150,000.

State of Minnesota Programs

The State of Minnesota offers two grant programs, funded by the Minnesota Legislature, that support historic preservation, interpretation and capital projects undertaken by history organizations and local units of government.

State Grants-in-Aid

The purpose of this program is to support projects conducted by organizations and institutions that interpret and preserve Minnesota's history. Available funds vary and are dependent on legislative appropriations. The maximum grant award is currently \$6,000 for historic properties listed on or determined eligible for listing on the NRHP. All other categories are limited to \$6,000, except for microform copies, which is capped at \$2,500. Funds must be matched at least one-to-one. Matching funds may be cash, in-kind and/or donated services or materials contributed to the project.

The primary recipients of State grants-in-aid awards are regional, county and local non-profit organizations whose primary purpose is historic preservation and/or interpretation. Eligible projects include:

- Historic properties
- Artifact collections
- Interpretive programs
- Microform copies
- Oral history
- Photographic collections
- Manuscripts
- Publications and research
- Museum environments
- Technology

Projects from non-historical organizations should fill a need that is not being met by a historical organization.

State Capital Projects Grants-in-Aid

The purpose of this program is to support historic preservation projects of a capital nature, including publicly-owned and -used buildings. There is usually one funding cycle each fall; grants are based on legislative funding. The primary recipients of State capital project grants are public entities as defined in State law, including county and local jurisdictions. Non-profit organizations whose primary purpose is historic preservation and/or interpretation, and which have entered into a qualifying lease or management agreement with an eligible public entity sponsor, are also eligible to apply. In order to be eligible for funding, the work must meet the following conditions:

- The expenditure funded must be for a public purpose;
- The property assisted must be publicly-owned;

- The project expenditures funded must be for land, buildings or other improvements of a capital nature; and
- The work must meet the Secretary of the Interior's Standards for Rehabilitation.

Two types of historic preservation projects are eligible for funding: restoration and/or preservation, and building systems and accessibility work.

State Historic Preservation Tax Incentives

As of June 2008, more than half of the states across the country, or approximately 70-percent of the states that tax income, have developed State tax credit programs for historic preservation projects. Most of these programs are similar to the Federal Income Tax Credit Program described above. Although they vary from state to state, most laws contain the following elements:

- Criteria for determining what buildings qualify for the credit;
- Standards to ensure that the rehabilitation preserves the historic and architectural character of the building;
- A method for calculating the value of the credit awarded, reflected as a percentage of the amount expended on that portion of the rehabilitation work that is approved as a certified rehabilitation;
- A minimum amount, or threshold, required to be invested in the rehabilitation; and
- A mechanism for administering the program, generally involving the SHPO and, in some cases, the State Department of Revenue.

Often, these State tax credits can be combined with Federal rehabilitation tax credits and other Federal incentive programs, such as low-income housing credits and the New Markets Tax Credit, to create an even greater incentive to rehabilitate the irreplaceable buildings and places in our communities.

Currently, Minnesota is in the minority and does not have a State tax credit program for historic preservation. There are on-going efforts by local officials, as well as grassroots organizations, to encourage the Minnesota Legislature to pass a State historic preservation tax credit for commercial and residential property. As it has been repeatedly proven across the country, the creation of a State tax credit is a boon for preservation and local economies alike.

State-Wide Non-Profit Organizations

The Preservation Alliance of Minnesota (PAM), established in 1981, is the only state-wide, private, non-profit organization advocating for the preservation of Minnesota's historic resources. PAM administers a preservation easement program in order to protect historically and architecturally significant properties in perpetuity. A preservation easement is a legal document between a property owner and PAM that limits the present and any future owner's ability to alter or degrade the features subject to the easement. The easement is recorded with the property's deed and may be granted on one or more exterior façades, interior architectural features, natural landscape and open space.

Preservation easements typically prohibit detrimental alterations to the appearance or material integrity of the property and require on-going

maintenance. The property may continue to be used for any purpose the owner chooses and it may be sold or leased at any time, subject to PAM's continuing easement.

Any building or property may qualify for a preservation easement if PAM determines that the property possesses architectural or historical significance. However, only donations of easements on properties listed in the National Register of Historic Places (including properties contributing to historic districts) are eligible for Federal income tax deductions. The assessed value of a qualifying easement is deductible as a charitable contribution on the donor's Federal income tax return. In addition, PAM typically requires a donation toward its Easement Endowment, which ensures the resources necessary to monitor and defend PAM's easement portfolio in perpetuity. Both the value of the easement and the accompanying endowment contribution are fully tax-deductible. State property taxes may also be reduced if the value of the estate is reduced due to the limitations placed on future developments.

Appendix HP-B:

HISTORIC CONTEXTS

Prepared for the City of Saint Paul by Stark Preservation Planning, LLC and the 106 Group Ltd., July 2008

Report Author: Will Stark, M.C.R.P.

INTRODUCTION

What is an historic context?

According to the National Park Service (NPS), a historic context is a document “created for planning purposes that groups information about historic properties based on a shared theme, specific time period, and geographical area.” In short, it is a critical part of the historic preservation planning process that helps organize the vast and diverse historic resources of a community based on thematic associations, geographical limits and chronological periods. A context study usually groups together common “inventoried” properties (from national, state, or local inventories) and then suggests which ones to further survey for designation purposes.

Why are historic contexts necessary?

Historic contexts are the cornerstones of the historic preservation planning process. Rather than being an end in themselves, they serve preservation planning by assuring that the *full range* of historic properties is identified and subsequently evaluated (and then, presumably, registered and protected). Contexts help to prioritize the preservation decision-making process by examining historic resources in relation to similar properties, determining how common or uncommon their occurrence, and ascertaining their significance relative to other resources. Historic contexts guide future survey and designation processes by proactively and objectively seeking geographical areas, resource types or themes that are likely to reveal valued historic resources. Within the local preservation planning process, they allow a heritage preservation commission (HPC) to pursue designation in a thoughtful, deliberate and coordinated manner, rather than responding to community crises or *ad hoc* development pressures. For an HPC, historic contexts are particularly critical, as they serve to justify the identification and designation of historic resources, which has regulatory consequences. Without an historic context to appreciate the relative significance of a resource, decisions made by Commissioners or staff are less able to withstand public scrutiny and legal challenges.

Current Applicable Historic Contexts

Historic contexts can be completed at the national, regional, state, or local level, depending on the theme and resource type. Saint Paul has representation in most of these types of contexts.

State Historic Contexts

In Minnesota, the State Historic Preservation Office (SHPO) has prepared numerous historic contexts, ranging chronologically from ancient Indian cultures to the mid-twentieth century. In what is referred to as “Post Contact Period Contexts” – after the period of initial European contact with native Indians – the SHPO has established the following historic contexts:

1. Indian Communities and Reservations: 1837-1934
2. St. Croix Triangle Lumbering: 1830s-1900s
3. Early Agriculture and River Settlement: 1840-1870
4. Railroads and Agricultural Development: 1870-1940
5. Northern Minnesota Lumbering: 1870-1930s
6. Minnesota’s Iron Ore Industry: 1880s-1945
7. Minnesota Tourism and Recreation in the Lake Regions: 1870-1945
8. Urban Centers: 1870-1940

These contexts provide a brief synopsis of the period, examples of associated property types, maps illustrating the geographic limits of the context and bibliographic resources. Saint Paul is geographically represented in Contexts 3, 4, 7 and 8.

State-wide Property Type Contexts

In addition to these broad state-wide contexts based on periods of development, the SHPO has established thematic contexts based on **property types**. These contexts include:

- State-Owned Buildings (with numerous sub-categories, including the State Capitol Complex)
- Bridges
- Hydroelectric Power in Minnesota: 1880-1940
- Finnish Log Architecture: 1880s-1930s
- Red River Trail in Minnesota: 1835-1871
- Minnesota Military Roads: 1850-1875
- Quarries and Mines
- Rock Art
- Lithic Scatters
- Earthworks
- Federal Relief Construction: 1933-1941
- Geographic Features of Cultural Significance

Saint Paul has examples of property types in many of these context categories.

State-wide Thematic Contexts

Other broad, thematically-based documents provide a context and means of historic evaluation for Saint Paul resources. The National Park Service, which oversees the National Register of Historic Places (NRHP), has developed a

Multiple Property Documentation Form (MPDF) for documenting **thematically-related properties**. Minnesota examples of MPDFs (or Thematic Resources documentation, as they were previously named) that contain contextual information relevant to Saint Paul resources include:

- Carnegie Libraries of Saint Paul Thematic Resources
- Federal Relief Construction in Minnesota
- Grain Elevator Design in Minnesota
- Iron and Steel Bridges in Minnesota
- Minnesota Masonry Arch Highway Bridges
- Minnesota Military Roads
- Railroads in Minnesota, 1862-1956
- Reinforced-Concrete Highway Bridges in Minnesota

These documents serve as a basis for evaluating the NRHP eligibility of related properties and contain valuable contextual information on groups of properties. The documents are available from the National Park Service or SHPO.

Saint Paul's Historic Context Process

In collaboration with the Ramsey County Historical Society, the Saint Paul HPC initiated its most significant step in the preservation planning process when the *Historic Sites Survey of St. Paul and Ramsey County* was undertaken from 1980 to 1983. Over 5,400 site forms were completed for the survey, more than 2,500 of which included information on the architect and contractor. Although the bulk of the properties was located in Saint Paul, the survey also included other Ramsey County cities. The survey findings were organized into 17 planning districts, summarizing the history, characteristics and key findings of each district. Properties already designated, those believed to be eligible for the NRHP or local designation, "additional sites of major significance" and potential historic districts were listed at the conclusion of each chapter.

The survey resulted in the designation of numerous individual properties and the formation of several historic districts. However, without well-developed historic contexts to understand the full story of the history and development of the city, only the most obviously significant resources received attention and moved forward with designation. While many other buildings were noted in the inventory, their significance could not be fully comprehended, and designation could not proceed, without the development of thorough historic contexts to describe and analyze the broader picture of Saint Paul's architectural and historic contributions and development.

The sites survey completed in 1983 provided a tremendous baseline for the initial inventory and evaluation of the city's resources; however, it is now more than 25 years old. The age of this data has become a limitation to the further development of historic preservation planning tools, including historic contexts. Since undertaking the survey, many changes have occurred in Saint Paul, including the loss of many of the inventoried properties. Furthermore, new property types and periods of construction are now being considered significant and worthy of historic designation, including examples of Modernism, suburban style residential development, and resources related to the mid-twentieth century automobile sales industry.

In 2001, Saint Paul prepared a comprehensive historic context study based on thematic areas of the city's development and inclusive of the entire city. Carole Zellie of Landscape Research and Garneth O. Peterson of BRW/URS prepared the study. The contexts included:

- Pioneer Houses: 1854-1880
- Residential Real Estate Development: 1880-1950
- Neighborhood Commercial Centers: 1874-1960
- Downtown Saint Paul: 1849-1975
- Churches, Synagogues, and Religious Buildings: 1849-1950
- Transportation Corridors: 1857-1950

Each historic context is introduced with an overview of the impacts of the theme on the historic development of the city and a description of the contextual framework. Sources used to form the context are discussed, including limitations. In general, the sources include such items as general histories, newspaper articles and advertisements, National Register nominations, photographic and other image collections of the Minnesota Historical Society, secondary sources related to the theme, and broader academic studies. In every case, the 1983 *Historic Sites Survey of St. Paul and Ramsey County* was referenced, although it was not within the scope of the project to update or revise the data from the earlier survey. Most contexts were organized by either a subdivision of the themes (for example "Rail Transportation" within Transportation Corridors) and/or chronological periods. Each context concludes with recommendations highlighting the priorities for future designation studies or further context development. Text is carefully footnoted with specific sources cited.

Additional Surveys and Other Sources for Historic Contexts

Since the extensive local survey efforts of the 1980s, the data base of inventoried properties in Saint Paul has expanded, mostly through various surveys and studies prompted by Federal undertakings and Section 106 of the National Historic Preservation Act. As a result, the inventory of properties on the SHPO data base has risen from 5,400 to more than 6,100. Extensive and detailed surveys, such as the ones conducted for the Central Corridor light rail transit project, have made important contributions to the collection of inventoried properties and to historic contexts. Contexts developed for these projects typically focus narrowly on the resources within the project's area of potential effect. Unlike those prepared for the City's planning purposes, they are less likely to take broad perspectives of neighborhoods or overall urban development trends into consideration. Still, they can be valuable to the City's preservation and designation process by providing a framework against which to evaluate resources for local heritage preservation designation and potential eligibility for listing on the NRHP.

Summary and Evaluation of Local Historic Contexts

Pioneer Houses: 1854-1880

This context describes and identifies those residences associated with the early settlement period of Saint Paul. Only 120 pre-1880 residences were identified in the 1983 survey; they are considered a rare property type in the city. The survey suggests that there may be a concentration of pre-1880 houses associated

with German and Czech settlement in the Uppertown area. Recommendations included: further survey work in the Thomas-Dale area to identify additional examples of this resource type; and further investigation of outlying farmhouses.

Since the recommendations were made, a designation study was completed in 2002 on the George H. and Hannah Hazzard House.

Residential Real Estate Development: 1880-1950

This context covers large geographic areas of Saint Paul that were developed as additions and subdivisions by land speculators and real estate brokers. It is useful in identifying residential districts representative of various periods of development and architecture. Recommendations included:

- The original plats of Hamline, Macalester Park, Merriam Park, Saint Anthony Park, and Warrendale were identified as good candidates to represent original marketing and planning ideals, and period architecture. Further study is warranted to determine if existing local historic districts represent the key ideas of their period of urban and architectural development.
- The authors recommended further development of a historic context called “Neighborhoods at the Edge of the Walking City” to include areas such as Uppertown, Frogtown and other early neighborhoods near downtown that were laid out and sold in a less-coordinated effort to a less transportation-sensitive clientele.

To-date, no action has been taken on these recommendations.

Neighborhood Commercial Centers: 1874-1960

The Neighborhood Commercial Centers historic context focused on the evolution of smaller commercial nodes reflecting the changing needs of Saint Paulites as the city and its residential and transportation patterns developed. This context is organized into the following frameworks and periods:

- Pioneer Period of Saint Paul Retailing: 1850-1872
- New Neighborhoods and Commercial Corners: 1872-1900
- Late Nineteenth-Century Shopping Streets: 1880-1900
- Streetcars and New Suburbs: 1900-1930
- Grocery Store to Supermarket: The Neighborhood Commercial Center: 1930-1960

Resource types covered in this context include corner stores, apartment/storefront combinations, business blocks, brick-front stores and automobile-based shopping centers. The authors noted that many of the properties in this category are among the most frequently altered, and therefore designation of examples with good integrity was encouraged. Many examples of commercial nodes were surveyed in the 1983 inventory, but it is likely that changes in integrity – for better and worse – have occurred in the intervening years. Early gas stations are singled out as particularly vulnerable to development. Recommendations included:

- re-survey of the resource type to assess effects of alterations since the 1983 survey;

- selective inventory of neighborhood commercial properties to identify other candidates for possible designation;
- designation studies for architect-designed 1880s examples of neighborhood commercial properties using criteria based on architectural significance as well as the relationship to early streetcar or passenger rail developments. Because of the frequency at which commercial storefronts are altered, designation was considered a matter of urgency.
- further context study on apartment buildings, a building type often found in or near neighborhood commercial centers.
- study and designation of gas stations, which are particularly vulnerable to redevelopment.

Since the context study, designation studies were completed for most of the recommended properties, including the Crosby Block, Arvidson Block, Schott Block, Hamline Apartments and Stores, Highland Theater, Grandview Theater, Old Fireside Inn & Tamarack Lodge Hall, and William Thompson Commercial Building.

Downtown Saint Paul: 1849-1975

Downtown Saint Paul is the most dynamic of all of the context areas. Because of its age, density, and cultural, economic and architectural significance, this historic context was given special focus. Its period of study extends well into the latter half of the twentieth century, to 1975, reflecting the continuing importance and redevelopment of this part of the city, as well as the loss of earlier historic fabric. The authors also conducted a brief reconnaissance survey to update the 1983 inventory; of the approximately 190 buildings previously surveyed in downtown, 50 had been razed. This fact emphasizes both the increasing rarity of early specimens of historic buildings as well as the regular growth of new building stock. The context is organized in the following framework and time periods:

- The Pioneer Years: 1849-1880
- The City of the Northwest: 1880-1900
- The Golden Era: 1900-1920
- Approaching Modernism: 1920-1950
- Postlude or Prelude: 1950-1975

This context also addresses the urban renewal and redevelopment of the 1960s, as well as the city's early interest in historic preservation, including the effort to save the old Federal Courts Building. The authors acknowledged the "vast amount of change" that downtown has experienced and recognized that not every building over 50 years of age can be saved. Instead, they emphasized the need "to recognize the significance of the area as a whole, and carefully consider the historic and architectural significance of each remaining building."¹

Recommendations included:

- designation of 20 properties considered "the most critical priorities for designation;"
- further study of smaller-scale, two- and three-story buildings on the fringes of downtown; and

¹ Historic Context: Downtown St. Paul, 1849-1975, p. 27.

- further survey and evaluation of properties from the 1950s and 1960s, since few were inventoried in the 1983 survey.

Based on the context study's recommendations, the City completed a designation study for the potential Rice Park Historic District in 2002; designation was not pursued. Other recommendations have not yet been implemented.

Churches, Synagogues, and Religious Buildings: 1849-1950

This study utilized the survey material of the many houses of worship to formulate a historic context inclusive of their historical and architectural contributions. The context is organized into four periods:

- Pioneer Congregations and New Immigrants: 1841-1880
- New Churches in New Neighborhoods: 1880-1900
- Early Twentieth Century Expansion: 1900-1930
- Churches in the Third and Fourth Generations: 1930-1960

The text provides backgrounds on the history, growth and development for each of the major religious sects in Saint Paul for each time period. Of the 180 inventoried religious sites, seven were locally designated at the time of the context study. Recommendations included:

- designation studies for 16 additional religious properties; and
- identification of adaptive uses for vacant or underutilized buildings.

In 2002, designation studies were completed for several religious properties based on recommendations in the context study, including Saint Matthew's Evangelical Lutheran Church, Trinity Norwegian Evangelical Lutheran Church, Zion German Evangelical Lutheran Church, Church of Saint Columba and Knox Presbyterian Church. The 1959 Ralph Rapson-designed Prince of Peace Lutheran Church (not listed among the 16 recommended for further designation study) was demolished in 2006 to make way for a condominium development. Other religious buildings continue to be vacant and threatened by development pressures or preservation issues. Saint Matthew's Evangelical Lutheran Church was listed on the Preservation Alliance of Minnesota's 10 Most Endangered Places list in 2008.

Transportation Corridors: 1857-1950

Among the most complex of the historic context studies is this one pertaining to various transportation corridors. Although inter-related, the study includes three distinct contexts:

- Rail Transportation: 1857-1950
- The Saint Paul Streetcar System: 1872-1953
- The Midway as a Transportation Center: 1883-1950

Within these contexts, a wide variety of overlapping property types was accounted for, including railroad lines; grade separations; bridges, train and streetcar shops; the Union Depot and streetcar stations; Lowertown warehouses; and related industries such as Seeger Refrigerator Company, 3M, Harvester, breweries, and industries located in the Midway such as manufacturers,

wholesalers, and automobile dealerships. Recommendations included:

- study of transportation corridors themselves (the context focused on the buildings) for potential designation;
- designation of the remaining buildings associated with Saint Paul's railroads, including any buildings not within the Lowertown Historic District;
- study of two significant railroad bridges: the Omaha Swing Bridge and the Chicago Great Western Bridge;
- designation study for the Minnesota Transfer Railway Company Roundhouse;
- designation study for the industrial complexes, including the 3M Main Plant, Hamm's Brewery Complex, and Jacob Schmidt Brewing Company;
- designation study for individual industrial buildings, such as the Coca Cola Bottling Co. and the Omaha Iron & Brass Factory;
- designation study of the University and Raymond avenues area for a potential historic district representing the manufacturing concentration in the Midway and industrial manifestations of the work of Saint Paul architects;
- further study of any remaining historic resources focused on automobile sales; and
- study of all remaining streetcar-related facilities, including the Selby Streetcar Tunnel, to determine which may be eligible for designation.

Since the time of the context development, the City designated a related district: the University-Raymond Commercial Historic District. The Carlton Lofts building within that district was rehabilitated using Federal historic preservation tax incentives. A designation study was completed in 2002 for the Minnesota Transfer Railway Roundhouse. A moratorium was placed on the Schmidt Brewery in 2006, and a designation study on the property was initiated. The property is now in the National Register nomination process. The Minnesota Department of Transportation developed a statewide MPDF on railroads in 2007, providing context to the rail transportation corridor and related facilities in Saint Paul.

Several studies completed for the Central Corridor LRT, mostly along University Avenue, have made contributions to our understanding of historic transportation corridors. Several properties and districts have been listed in, or determined eligible for listing in, the NRHP, including the Minnesota Milk Company building.

Archaeological Resources in Saint Paul

Extant archaeological resources associated with the large Native American population that lived in the current jurisdiction of Saint Paul before Euro-American settlement have been documented in a series of state-wide contexts developed by the State Historic Preservation Office. Each context consists of a written narrative defining the context's broad historical patterns, temporal limits and geographical boundaries. Goals and priorities have been developed for many contexts. In addition, a summary of the identified property types associated with each context is provided. The contexts provide a basic bibliography of Minnesota archaeology, and should be consulted and

referenced when encountering archaeological resources in Saint Paul, or if there is the potential to encounter such resources.

Archaeological resources related to the early industrial and residential settlement of Saint Paul are only just now being recognized and unearthed. Discoveries, such as Nina Clifford's bordello during the excavations for the Science Museum of Minnesota and the remains of a brewery found when creating the Bruce Vento Nature Sanctuary, only scratch the surface of the resources remaining beneath our feet. These types of resources not only inform us of the way our communities lived and worked many years ago, but can also provide compelling exhibits and public educational activities.

The City of Saint Paul will need to plan for instances where archaeological resources – Native American or historic – are or may be encountered in the development process. The variable archaeological resource types make the development of historic contexts outside of those already completed infeasible. Instead, Saint Paul should plan for the treatment of archaeological resources and develop a methodology for evaluating them as they are encountered.

HISTORIC CONTEXTS FOR A NEW ERA

The historic contexts prepared for the City in 2001 touch on nearly every significant property type commonly found in Saint Paul and include portions of most neighborhoods. They are well-organized and include nearly all of the dominant building types, styles and development trends in Saint Paul from the 1850s to the 1950s. These contexts use important factors of urban development – growth of transportation systems and real estate developments – as guides to include the majority of the city's historic growth. Most historic property types were included in one or more contexts, although some property types bear more in-depth examination.

While the 1983 survey served as the foundation of the 2001 context study, no efforts were made to update, amend or revise the survey data (with the exception of the *Downtown* context to account for surveyed sites that were no longer extant). When the contexts were written, the survey was nearly 20 years old, and it is now dated by a quarter century. Although a logical and important basis for the context study, the dated nature of the survey data is perhaps the weakest link in the methodology of the historic context study.

It should be noted that since the 2001 context studies were completed, authors Jeffrey A. Hess and Paul Clifford Larson published *St. Paul's Architecture: A History* in cooperation with the City of Saint Paul HPC (University of Minnesota Press, 2006). With extensive illustrations and a well-written narrative, the book provides a comprehensive overview of the city's built environment – with an emphasis on extant structures – from 1840 to 2000. While not written using the typical framework of a historic context (listing property types and providing recommendations), it is arranged chronologically and is a useful resource for further investigation and evaluation of a wide range of Saint Paul's architectural resources. In essence, it can be substituted for, or cited in, additional historic context studies.

The march of time and the continuation of history play another role in the development of new contexts. Fifty years is the general standard for

consideration of historic status (although Saint Paul's HPC designation criteria do not require that a property be greater than 50 years old). However, only two of the contexts extend into the current 50-year retrospective period (*Downtown*, which extends to 1975; and *Neighborhood Commercial Centers*, which extends to 1960). While the vast majority of Saint Paul's development was completed by the 1950s, it is not a city frozen in time. While smaller in scope, new and expanded contexts representing the era of growth and styles of the latter half of the twentieth century are necessary.

Other omissions in the historic contexts can be rectified as we learn to further appreciate and value other resource types. The natural landscape of Saint Paul, dominated by the Mississippi River Valley, has been managed and shaped by the hands of humans for centuries. An understanding of the important relationship of people with the landscape is only now being recognized and respected. Resources of the Post-World War II era are coming into consideration as historic patterns of development, in addition to architecture.

Following are **recommendations for additional historic contexts and themes**, in no particular order, to be explored to contribute to a more complete understanding of Saint Paul's historic resources and to guide the preservation planning process.

Saint Paul Parks, Parkways and Cultural Landscapes

Saint Paul has an important heritage of early development of park land for public enjoyment, including Como Park and the network of parkways. The public ownership and development of the parks resulted in their exclusion from previous historic context studies. As the preservation community increases its appreciation for historic landscape design, it becomes increasingly important to understand the context within which the public park system was developed, and what makes it important to the City's quality of life and unique character.

Neighborhoods at the Edge of the Walking City

The authors of the 2001 historic context study concluded that neighborhoods such as Uppertown and Frogtown, as well as other unstudied areas near downtown, did not fit neatly into the study of Residential Real Estate Development because they were platted and sold in a less-coordinated effort to a less transportation-sensitive clientele. These areas would be well-served by the development of a historic context. The neighborhoods largely excluded from previous studies (except for commercial and industrial properties) include Thomas-Dale, Uppertown, and Frogtown/Midway.

Post-WWII Development, Modernism and Historic Preservation

Although briefly addressed in existing contexts, both isolated and large-scale pockets of residential, institutional, industrial and commercial development during the post-World War II era should be more fully developed. Descriptions of the housing styles, such as the "rambler," should be included, along with the impact this era had on the shape of Saint Paul. Although this period of time is most notably associated with great suburban expansion, it was also an era that added 13,000 new dwelling units in Saint Paul proper. Areas of post-war residential developments can be found in the outer corners of Saint Paul,

including portions of the Highland Park, Greater East Side and Highwood neighborhoods. In addition, infill pockets of high-quality Modernist design, such as the Stone Bridge development in Highland, represent an important era of architecture, while modest public housing projects designed for low-income, returning World War II veterans in the 1940s, such as the John J. McDonough Homes, demonstrate the public response to housing shortages. Individual examples of high-style Modernist housing, such as the 1962 Marcel Breuer-designed house in Highwood, may be located throughout the city. Institutional and commercial buildings outside of downtown, such as the O'Shaughnessy Auditorium on the College of Saint Catherine's campus, also show evidence of the rising interest in modern building styles. Several superior examples of industrial buildings from the 1940s and 1950s survive, scattered on either side of University Avenue and on Marshall Avenue.

Within the downtown, notable examples from the Modern era were mostly constructed as part of a coordinated urban renewal campaign, including the Minnesota Mutual Life Insurance Company Building (1955), Degree of Honor Building (1961), Hilton Hotel (1966) and Dayton's Department Store (1963). At the same time, early preservation efforts began in the 1960s and 1970s. This early approach to preservation was different from today's approach, and has begun to take on a character and significance of its own. These movements are briefly addressed in the Downtown context (which extends to 1975), but should be more fully developed as preservationists begin to address the historic significance of Modernism and various forms of revitalization as part of its architectural legacy. As previously recommended within the Downtown context study, survey and evaluation of the downtown buildings of the 1950s and 1960s should be undertaken in coordination with the development of a historic context. Rather than being limited to the downtown, the context should extend to the entire city to include other unknown specimens of architectural design and development patterns in the second half of the twentieth century.

Mississippi River Valley: Navigation and Commerce

The Mississippi River has played a pivotal role in the life of Saint Paul for millennia. The connection and access to the Mississippi River as a transportation corridor was critical in siting the city that would become Saint Paul. This important link continued well into the twentieth century. Historic contexts centered on riverway resources have not been developed to-date. Resources such as the Saint Paul Municipal Elevator and Sackhouse, Meeker Island Lock and Dam, and potential buried sites or unevaluated standing structures would be included in such a context. Beyond the Mississippi River and its immediate banks, the natural topography of the Valley of Saint Paul is an important resource itself as a cultural landscape, with overlapping cultures and historic sites ranging from ancient Indian communities to early twentieth century industry. The "Mississippi River Valley of Saint Paul Cultural Landscape" was placed on the Preservation Alliance of Minnesota's 10 Most Endangered Places list in 2007 in response to a variety of development pressures that have been placed on the valley. A new historic context exploring the long tradition of human occupation and industry along, and the cultural significance of, the Mississippi River and its valley would assist the City in understanding and protecting the landscape and its resources.

Immigrant and Ethnic Communities

As with many American cities, Saint Paul has a long history of being the adopted home of immigrant communities. Since its settlement, various ethnic communities, mostly European, have made their imprints on the City's culture and character. Much has been written acknowledging the contributions of German, Irish, Swedish, Italian and other immigrant communities' historic and on-going influence on Saint Paul's culture and its built environment. In more recent decades, new immigrant communities from the Americas and Southeast Asia have arrived, bringing with them their own traditions, tastes and cultures. The Frogtown neighborhood has become home to several Southeast Asian communities, and parts of the West Side have been adopted by Mexican immigrants. All immigrant communities, along with the second and third generations of Americans, have placed their unique cultural stamp on these areas, reforming and reshaping their histories. While all immigrant groups need to be considered for a complete historic context of the city, more time needs to pass in order to better understand the significance of some of the patterns of more recent immigrants in order to interpret them appropriately.

Other Resource Types

A number of property types did not fit neatly into the thematic headings of the 2001 context study or were only briefly mentioned within those contexts. The importance of the resource types to the architectural character of Saint Paul or to its historical development warrant further exploration and their inclusion in a historic context study.

Multiple Housing Units

Current historic contexts for residential properties focus on single-family houses, the dominant housing type in Saint Paul. Multiple housing units – small and large apartment buildings and rowhouses – can be found in both concentrated areas and scattered within neighborhoods of single-family residences. These properties have played an important role in housing Saint Paulites who were unable to obtain, or uninterested in the city's "ideal" of living in, a single-family house. Many of the apartment buildings possess architectural features reflective of their period of development. In the 2001 context study for *Neighborhood Commercial Centers*, the authors recommended a context study on apartment buildings as a property type.

Schools

Although considered part of the neighborhood studies, public and private schools located throughout the city, including colleges and universities, can best be evaluated within their own comparative context. The city has a range of architectural styles and periods, from Collegiate Gothic to Modern, that reflect the educational ideals, purposes and methods of their respective periods.

Fire Houses

Again, reflected in neighborhood development, this civic property type would benefit from a comparative analysis of the styles and trends of currently used or rehabilitated historical fire houses and fire engine stations to evaluate and prioritize preservation needs.

Early Gas Stations

A number of unique and early gas stations are extant within the city, and it is possible that others may remain unsurveyed. In the *Neighborhood Commercial Centers* historic context, gas stations were noted as “particularly vulnerable to redevelopment.”² Further inventory, evaluation and contextual development of early gas stations would assist in identifying and preserving the rare extant specimens.

Automobile Dealerships

Automobile dealerships were a common sight along University Avenue in the mid-twentieth century. Often large and incorporating Moderne design elements, they are rapidly vanishing. Although briefly mentioned within the *Transportation Corridors* historic context, little contextual information is provided. A reconnaissance survey to identify the remaining automobile dealerships should be conducted to evaluate their integrity and determine if a historic context is warranted.

Industrial Buildings

St. Paul has a number of important industrial properties away from the downtown area. They have received little notice, let alone adequate study, though many were key elements in the development and sustenance of outlying neighborhoods. Specialty manufacturing in particular has also been instrumental in the growth of the city into an important urban center. Some of the properties may also possess architectural and/or engineering significance.

² *Neighborhood Commercial Centers: 1874-1960*, p. 16.

