

**CITY OF MINNEAPOLIS
CPED PLANNING DIVISION
HERITAGE PRESERVATION COMMISSION STAFF REPORT**

FILE NAME: 2538 2nd Avenue South

DATE OF APPLICATION: January 5, 2009

APPLICANT: Meyer Scherer and Rockcastle on behalf of Minneapolis College of Art and Design (MCAD) 612-375-0336

PUBLICATION OF STAFF REPORT: February 3, 2009

DATE OF HEARING: February 10, 2009

APPEAL PERIOD EXPIRATION: February 20, 2009

CATEGORY: Contributing Structure to the Washburn-Fair Oaks Historic District

CLASSIFICATION: Certificate of Appropriateness: Demolition

STAFF INVESTIGATION AND REPORT: Aaron Hanauer, (612) 673-2494

DATE: February 3, 2009

A. BACKGROUND

At the October 14, 2008 Heritage Preservation Commission meeting, the Minneapolis College of Art and Design (MCAD) and their representatives presented the MCAD master plan to the Heritage Preservation Commission. No decision or action was sought or taken, but advice was offered by the Commission to MCAD.

The master plan was broken into five phases and MCAD focused the presentation on Phase 1A plans which dealt primarily with providing additional off-street parking (Attachment H1). This included an underground parking ramp, surface parking lot, and no demolition of structures. The applicant has submitted revised plans. The applicant now proposes to demolish 2538 2nd Avenue South and construct a surface parking lot that would accommodate 138 vehicles on the parcels of 2527-2546 2nd Avenue South (see Attachment B18).

B. DESCRIPTION

B1. District

The Washburn Fair-Oaks Historic District is an approximately 18-block area that was locally designated in 1976 (see Attachment A2). The district is bounded by Franklin Avenue on the north, Fourth Avenue and I-35W on the east, 26th Street on the south, and the alley between Nicollet and First Avenue on the west, including the northeasterly corner of 24th Street and Nicollet. The district's period of significance is from 1858 to circa 1939. The Washburn Fair-Oaks District is significant for its concentration of residences built in the late 19th and early 20th centuries. These structures range from some of the city's most prestigious residential structures to modest framed houses, as well as constructed multifamily buildings. The architectural styles include small vernacular cottages, Queen Anne residences, American foursquares, brick rowhouses, apartment buildings, and stone mansions. The collection of these structures adds to the visual cohesion of the area and describes the development period of the area at that time.

In addition to the residential structures, the district contains prominent art buildings and infill development. In 1915, the original Minneapolis Institute of Arts (MIA) Building, designed by McKim, Mead, and White, was completed. In 1916, the Julia Morrison Building, which was an addition to the Minneapolis Institute of Arts and new home to the Minneapolis School of Fine Arts was constructed (see Attachment A3). The district also contains MCAD's 1974 college building designed by world renowned architect Kenzo Tange, modern apartment buildings, and surface parking lots (see Attachment A3 and A4).

B2. Washburn Fair Oaks: Blocks 11-13:

Today, Blocks 11-13 of the Washburn-Fair Oaks Historic District primarily consist of the MIA, Children's Theater Company (CTC), MCAD, and residential structures (see Attachment A3 for map and A4-A5 for aerials).

The Minneapolis Institute of Arts Building and the Julia Morrison Building, designed by Edwin Hawley Hewitt, are located on opposite sides of Block 11. They were positioned and designed in a way that an axial relationship is formed with 2nd Avenue South (see Attachment A8.5). The McKim, Mead, and White Building faces north towards Washburn-Fair Oaks Park and East 24th Street. The main entrance is lined up with 2nd Avenue South. The Julia Morrison Building, which faces south onto what was East 25th Street, has its main entrance lined up with 2nd Avenue South (see Attachment A9.5 and Attachment A9.6).

From 1916, when the Julia Morrison Building was constructed, to the early 1970's, Blocks 11-13 went primarily unchanged (see Attachment A9.5). In 1974, a \$26 million dollar expansion took place which added to the arts complex the Children's Theatre Company auditorium, an expansion to the MIA, a new arts building, a bus parking lot, and the 3rd Avenue parking ramp (see Attachment D8). This area was dubbed the Minneapolis Society of Fine Arts Park. For this expansion, approximately 32 houses were demolished, however, plans that would have demolished an additional 24 houses for a surface parking lot were denied by the City Council (see Attachment D9).

The 1974 MIA expansion and the new arts school building were designed by world renowned architect, Kenzo Tange (see Attachment D1-D6). Mr. Tange designed only one other building in the United States (The American Medical Association in Chicago, Illinois). Although the Tange Art School Building is not designated, it is a City of Minneapolis historic landmark.

The Tange Building located on the western side of 2nd Avenue South was built in a manner to respect the urban fabric that existed in the neighborhood. MCAD and the Minneapolis Society of Fine Arts in 1974 stated that one of the key reasons that Kenzo Tange was selected as the architect of the expansion was the, "Mutual concern for the interrelationship of buildings and their functions with the total fabric of an urban environment (see Attachment D1)."

Mr. Tange provides additional details on his design philosophy:

"The city must serve as a place to live, a place to work, a place to play, and a place for traffic involved in these three activities. In all probability, the most important factor in making a city an organic entity it is core. However, equally important is a comprehensive method of linking all the various functions that comprise the whole city. The house, the street, the institution, the neighborhood, the district—these various levels of the community are the elements of which the city is comprised. Each element must have

a certain degree of unity and perfection, and at the same time each must open onto a higher level and help create a system for a larger entity. We must consider the problem of preserving identity at each level, and at the same time we must find some way of making the meaning and value of each element comprehensible within the total system (see Attachment D2)."

In addition to respecting the residential fabric of the Washburn-Fair Oaks District, it is apparent that Tange's Art Building orientation and location respected the axial relationship the 1913 and 1916 arts buildings have with 2nd Avenue South (see Attachment 8.5 and 8.6).

Until 1987, the MIA, MCAD, and the CTC were collectively known as the Minneapolis Society of Fine Arts and overseen by one board of trustees (see Attachment M1). In 1987, a reorganization took place that separated the entities.

The southern portion of Blocks 12 and 13 have and continue to be primarily residential (see Attachment A9). Currently there are nine structures south of the Kenzo Tange art school building, eight are residential structures and six are contributing to the Washburn-Fair Oaks Historic District. Through the early 1980's the southern portion of Blocks 12 and 13 had a greater concentration of buildings (see Attachment A6). However, since 1987, MCAD has demolished five structures in the southern portion of Blocks 12 and 13.

- 130 East 26th Street (1988)
- 2544 2nd Avenue South (1988)
- 2546 2nd Avenue South (circa 1988)
- 122 East 26th Street (1995)
- 2535 2nd Avenue South (2002)

B3. 2538 2nd AVENUE SOUTH

The subject property, 2538 2nd Avenue South, is a vernacular style two-story residential structure located just to the south of the 1974 Kenzo Tange Arts Building (see Attachment A10 and D6). It is currently a duplex, but it was likely originally built as a single-family residence. The structure was moved to this site in 1894; the exact building date and the location the property was moved from is not known. The property appears to have had few alterations in the 115 years. The property contains a normal-pitched, front gabled roof. The roof contains a slight eave overhangs and the chimney was built within the roof's ridge. The exterior walls contain wood clapboard siding. The fenestration on the front and side elevations is asymmetrical. The window openings appear to be original and windows may also be original. The original porch, which spanned the front elevation, was removed and a covered entry with pilasters and pediment was built in its place (see Attachment B14 for more details on house history submitted by applicant).

The garage is also a contributing structure to the Washburn-Fair Oaks Historic District. It was built in 1932 which is within the period of significance.

C. PROPOSED WORK

The Applicant is proposing to demolish the residential structure at 2538 2nd Avenue South and construct a 138-space surface parking lot on the properties at 2527-2546 2nd Avenue South (see Attachment B17 for site plan). The applicant states that the reason for the parking lot is the combination

of the Master of Fine Arts (MFA) program being incorporated into the main campus and the MIA's requirement to vacate use of the ramp.

The applicant has not provided the numbers of additional students and faculty that are part of the MFA program. The applicant has also not provided numbers/figures on an increased demand for parking.

D. NECESSITY OF DEMOLITION

The Minneapolis Code of Ordinances, Title 23, Heritage Preservation, Chapter 599 Heritage Preservation Regulations states that before approving the demolition of a property within a historic district, the commission shall make findings that the demolition is necessary to correct an unsafe or dangerous condition on the property, or that there are no reasonable alternatives to the demolition. In determining whether reasonable alternatives exist, the commission shall consider, but not be limited to the significance of the property, the integrity of the property and the economic value or usefulness of the existing structure, including its current use, costs of renovation and feasible alternative uses. The commission may delay a final decision for a reasonable period of time to allow parties interested in preserving the historic resource a reasonable opportunity to act to protect it.

D1. UNSAFE OR DANGEROUS CONDITION

The demolition is not necessary to correct an unsafe or dangerous condition on the property. The applicant has not claimed that the subject property is in unsafe or dangerous condition. Instead the applicant states the reason for demolition is that there are no alternatives (see Attachment B4).

The applicant has listed the repairs that are required for maintenance of the structure: shingled roof, siding repairs, chimney tuckpointing, foundation work, need for heating replacement, and electrical updating. However, these repairs are routine for the upkeep of a historic property.

D2a. REASONABLE ALTERNATIVES TO DEMOLITION (MCAD)

The applicant states that no reasonable alternatives to the destruction of 2538 2nd Avenue exist because the property is functionally obsolete and not suitable for the College's use in its current configuration (see Attachment B4).

The applicant has attempted to have the property moved rather than demolished and provided documentation on their attempts to relocate the property (see Attachment B15). They state that these efforts did not turn up someone that is interested in the property.

D2a. REASONABLE ALTERNATIVES TO DEMOLITION (CPED)

CPED believes that reasonable alternatives to demolition do exist for the structure at 2538 2nd Avenue South. This property, which is Zoned OR3/Institutional Office Residential, has provided and could continue to provide housing for six students. In addition, the subject property could also serve a nonresidential use. The following is a partial list of other uses that could occupy the subject property: coffee shop (limited 30 seats), bookstore, restaurant (limited to 30 seats), early childhood learning center, community center, development and achievement center, museum, office, and/or child care center.

Reasonable alternatives also exist to assist in providing MCAD off-street parking. CPED has encouraged MCAD to pursue a continuation of the shared parking agreement with the MIA and for MCAD to maximize the use of their 41 off-street parking spaces (see Attachment E5-E6). If MCAD was able lease 140 parking spaces through a continued shared parking agreement with the MIA in the parking ramp, surface parking lots, or combination of the existing off-street parking areas it would provide the school ample off-street parking and not require the demolition of the subject property. CPED staff has asked for verification that MIA has terminated the shared parking agreement, but the applicant has not provided this information to date (see Attachment F).

The three institutions currently have a substantial amount of off-street parking. At this time there are 666 off-street parking spaces for the three institutions (see Table 1). This is 94 percent of the off-street parking required by the Zoning Code (see Table 2). CPED staff is unaware of parking complaints by residents or other stakeholders in the area because of the institutions. CPED also believes that the overlap of the institution uses compliments each other well. The MIA and CTC peak user times are evenings and weekends. The peak user time for MCAD is weekdays.

In addition, CPED staff believes that the existing off-street parking is underutilized. Staff has conducted site visits and has seen that the 3rd Avenue surface parking lots are underutilized during weekdays, which is the peak demand for MCAD.

Table 1: MIA Off-Street Parking

Parking Structure	Off-Street Parking Spaces
1. 3 rd Avenue Parking Ramp	387
2. 3 rd Avenue/25 th Street parking lot	91
3. 3 rd Avenue/24 th Street parking lot	147
4. MCAD existing parking spaces	41
Total	666

Table 2: Off-Street Parking Calculation

Institution	Parking Requirement
MIA	550 (based on 1 space per 500 sq. ft.)
CTC	207 (based on 20% of capacity)
MCAD	187 (based on 1 per 5 students @ 800 students and number of class rooms)
Gross Total	944 spaces
Historic District Reduction in Parking Spaces 25%	236 spaces
Total	708 spaces

Furthermore, alternatives to driving exist in this area. Living quarters are abundant around campus and the MIA, the campus is well served by bus service on Nicollet and 3rd Avenue, and the Midtown Greenway is in close proximity which provides an additional alternative.

A second alternative to the demolition of 2528 2nd Avenue South is the submission of a historic variance application to reduce the off-street parking requirements for the school. A historic variance is departure from the literal requirements of the zoning regulations governing a landmark or property in an historic district where strict adherence would cause undue hardship due to special conditions or circumstances unique to a site. If a historic variance was approved it would allow MCAD some relief

from the off-street parking required by the zoning code. The applicant to date has not expressed interest in this alternative.

D2b. SIGNIFICANCE

The subject property, 2538 2nd Avenue South, is significant for at least four reasons.

1. It is a contributing structure to the Washburn-Fair Oaks Historic District. The property, which is a modest residential structure, is consistent with other late 19th century and early 20th century modest structures within the district in the property's scale, size, and massing.
2. It helps define the southern boundary of the Washburn-Fair Oaks District. The subject property along with seven contributing structures along 26th Street East serve as the southern boundary of the Washburn-Fair Oaks Historic District (see Attachment A2 and A9). Even though the property is not located directly on the southern border it helps provide residential context and improves the setting of the residential structures to the east and west.
3. It helps define the original axial relationship of the 1913 MIA Building and the 1916 arts building with 2nd Avenue South (see Attachment 8.5). 2nd Avenue South is an important street for the Washburn-Fair Oaks Historic District and the iconic arts buildings. The subject property, which is the only property that addresses onto 2nd Avenue between 25th Street and 26th Street, helps strengthen this axial relationship and the purpose of 2nd Avenue South (see Attachment 8.5 and 8.6).
4. It provides context for the Kenzo Tange's 1974 Arts Building. The Tange Building is currently not designated; however, it is a City of Minneapolis historic landmark. The subject property is located directly to the south of the Tange Art Building. In 1974, MCAD stated or promoted the following about Mr. Tange taking into consideration the residential context of his art building :

“External urban design considerations such as the characteristics of the neighborhood greatly influenced Tange's concept for the complex (see Attachment D3).

“At almost every turn in every building, a person can orient himself and his function to other people, other functions, other buildings and other parts of the neighborhood and the city (see Attachment D5).”

“The remarkable skill with which he has manipulated inside and outside spaces has enabled him to create a way, as he [Tange] puts it, to make the meaning and value of each element comprehensible within the total system, including the whole environment and that was a primary concern (Leonard Parker, associate architect to Mr. Tange see Attachment D5).”

D2c. INTEGRITY

The structure is a contributing structure to the Washburn-Fair Oaks Historic District and retains at least seven out of eight aspects/qualities of integrity based on the National Register evaluation (see attachment C for description of the individual aspects of integrity). The only aspect of integrity that it is unknown if the property still possesses is interior integrity.

Location: The property's integrity of location remains intact since the subject property was moved to its current location in 1894. As the National Register states, when a property is moved within the period of significance the property retains integrity of location. The Washburn-Fair Oaks District's period of significance is from 1858 to approximately 1939.

Design: The property retains its design integrity. Few exterior alterations have been made to the subject property on the front and side elevations. The open front porch on the front elevation has been removed and replaced with a covered entrance. This, however, does not constitute a loss of integrity. An alteration to a front porch is one of the most common alterations and has continued the function of the subject property as a residential structure (Source: A Field Guide to American Houses, 1984, p 14).

Setting: The applicant has made the case that the southern portion of Blocks 12 and 13 does not have a compelling physical presence along East 26th Street (see Attachment B6 and B13).

CPED disagrees with this assessment. Staff realizes that the property's integrity of setting has been compromised with the removal of nearby contributing structures on 2nd Avenue and 26th Street East; however, the residential setting remains intact in that the subject property borders contributing structures along Stevens Avenue South and across the street from contributing structures at 200-210 East 26th Street (see Attachment A5 and A9).

CPED also believes that if the Washburn-Fair Oaks Historic District southern boundary is analyzed in its entirety it shows that a cohesive group of residential and commercial structures retain their setting, and that the subject property plays an important role in retaining the southern boundary of the Washburn-Fair Oaks Historic District (see Attachment A8 and A9). Currently, seven of the twelve structures along East 26th Street are contributing structures to the district (see Attachment A2 and A9). Even though, the subject property is not along the southern boundary it is the structure closest to the southern boundary and links the eastern and western portion of the southern boundary.

Materials: The building possess integrity of materials. The property appears to retain the original wood clapboard siding, chimney, window openings, and windows.

Workmanship: This building was built with few flourishes, but integrity of workmanship is still evident in the existing trim around a set of windows, the thin wood clapboard siding. In addition the massing and built form that are consistent with similar structures within the district.

Feeling: The building's integrity of feeling remains. The subject property continues to serve its original function as a residential property at the border of a historic district. In addition, the subject property is a similar design, scale, size, and massing as the neighboring residential properties to the west along Stevens Avenue and the four-unit buildings to the southeast of the subject property. Even though the front elevation has been altered with the removal of an open front porch, the property's expression of a particular period of time is evident.

Association: The property's integrity of association remains. Even though neighboring residential properties have been razed the remaining neighboring properties provide enough evidence with the association of a residential area.

Interior Integrity: It is likely that the interior has been substantially altered with the likely conversion to a duplex.

D2d. ECONOMIC VALUE OR USEFULNESS OF THE EXISTING STRUCTURE

The subject property does have economic value and usefulness in its current function. The subject property is a two-unit, three-bedroom building that has provided housing for six MCAD students. The property is not structurally deficient and can continue to provide housing for students. The zoning of this property, OR3, also allows for numerous nonresidential uses..

Since the property is owned by MCAD, Hennepin County does not assign an assessed value to the property or land.

E. PREVIOUS ACTIONS

Staff is unaware of the City of Minneapolis Heritage Preservation Commission approving a demolition of a contributing structure to a historic district or a city landmark for approval of a surface parking lot.

The following is a partial list of City Council, City Planning Commission, and Heritage Preservation Commission decisions that have dealt with the demolition of contributing structures in the Washburn-Fair Oaks Historic District for parking or decisions that involved the issue of shared parking:

- In 1974, a surface parking lot for the Minneapolis Society of Fine Arts was denied and the construction of the 3rd Avenue parking lot was required. The main reason the surface parking was denied was because it would have required the destruction of additional residential structures (see Attachment D9).
- On March 12, 2002, MCAD proposed tearing down the house at 2535 2nd Avenue South for a surface parking lot. The Heritage Preservation Commission denied this request. MCAD appealed this decision to the Zoning and Planning Committee, and they granted the appeal to allow for the demolition. The house was torn down, but a surface parking lot was not constructed.
- In September 2002, the Planning Commission approved a conditional use permit (CUP) for the 2002 MIA expansion (BZZ 779). As part of this approval, a parking variance was approved to allow for the three institutions to use the existing off-street parking configuration.

F. APPLICABLE ORDINANCE AND POLICIES

F1. ORDINANCE

On January 9, 2009, The City of Minneapolis adopted a zoning code amendment that updated the city's off-street parking standards and reduced the number of off-street parking required for most nonresidential uses (see Attachment D10 for press release). The revisions recognize the negative consequences associated with oversupplying parking. It has been shown that an overabundant supply of off-street parking:

- Precludes a balanced transportation system of encouraging use of single-occupancy automobiles;
- Sends excessive stormwater runoff into lakes, rivers, and streams;
- Increases urban heat island effect;
- Conflicts with the traditional urban character that the City's policies seek to promote.

The 2009 revised off-street parking revisions also reduced the off-street parking requirement for nonresidential structures in historic districts (see provision 541.430 below). This reduced parking

requirement was added in large part to prevent historic structures from being torn down for surface parking lots. Nationally, the most common reason for the demolition of historic structures was to create a surface parking lots (Source: December 1993 American Planning Association Planning Advisory Service memo).

541.430. Landmarks and historic districts. The minimum off-street parking requirement for nonresidential uses located in designated landmarks or located in contributing structures in historic districts shall be seventy five (75) percent of the minimum requirement specified in Chapter 541, Off-Street Parking and Loading.

F2. COMPREHENSIVE PLAN POLICIES

The following City of Minneapolis Comprehensive Plan policies do not support the proposed demolition of 2538 2nd Avenue South:

Policy 1.7 of the Minneapolis Plan, adopted in 2000, states that “Minneapolis will recognize and celebrate its history.” This policy is supported by the following implementation step “encourage new developments to retain historic structures, incorporating them into new development rather than demolishing them.” In addition, Policy 4.14 of the 2000 Comprehensive Plan states that “Minneapolis will maintain the quality and unique character of the city's housing stock, thus maintaining the character of the vast majority of residential blocks in the city.” The following implementation step is listed under this policy “encourage adaptive re-use, retrofit and renovation projects that make the city's housing stock competitive on the regional market.”

In 2008 a draft version of Minneapolis Plan was approved by the City Council and submitted to the Metropolitan Council for formal review. Once the formal review is complete The Minneapolis Plan will be adopted by the City Council. While this is not the official planning document the policies in the plan provide additional support for the proposed ordinance amendments. The following are policies and implementation steps from the plan.

Policy 8.7: Create a regulatory framework and consider implementing incentives to support the ethic of “reduce, reuse, and recycle” and revitalization for buildings and neighborhoods.

8.7.1 Protect historic resources from demolition and explore alternatives to demolition.

8.7.2 Research and modify the preservation and zoning ordinances as they relate to demolition of historic resources, in order to better serve neighborhoods.

Policy 8.8: Preserve neighborhood character by preserving the quality of the built environment.

Policy 8.11: Improve and adapt preservation regulations to recognize City goals, current preservation practices, and emerging historical contexts.

Policy 10.7: Maintain and preserve the quality and unique character of the city's existing housing stock.

10.7.1 Rehabilitation of older and historic housing stock should be encouraged over demolition.

10.7.3 Encourage adaptive reuse, retrofit and renovation projects that make the city's housing stock competitive on the regional market.

G. PUBLIC COMMENTS

CPED notified property owners within 350 feet of the Demolition of Historic Resource application on January 27, 2009. As of February 2, 2009, the MIA, CTC, and the Whittier Alliance have submitted letters (see Attachment I).

H. FINDINGS

1. The Washburn Fair-Oaks District is significant for its concentration of residences built in the late 19th and early 20th centuries. These structures range from some of the city's most prestigious residential structures to modest framed houses, as well as constructed multifamily buildings. The architectural styles include small vernacular cottages, Queen Anne residences, American foursquares, brick rowhouses, apartment buildings, and stone mansions. The collection of these structures adds to the visual cohesion of the area and describes the development period of the area at that time.
2. The district's period of significance is from 1858 to circa 1939.
3. The subject property, which has been at this location since 1894, is a contributing structure to the Washburn-Fair Oaks Historic District.
4. The demolition is not necessary to correct an unsafe or dangerous condition on the property.
5. Reasonable alternatives exist that would allow for preservation of the subject property including the continued use of the property as a residential structure. The property could be used as a variety of permitted or possibly conditional uses allowed in the OR3 Zoning District.
5. The structure is significant for it is a contributing structure to the Washburn-Fair Oaks Historic District. The property, which is a modest residential structure, is consistent with other late 19th century and early 20th century modest structures within the district in the property's scale, size, and massing.
6. The structure is significant for it helps define the southern boundary of the Washburn-Fair Oaks District.
7. The structure is significant for it helps reinforce the axial relationship of the 1913 MIA Building and the 1916 arts building with 2nd Avenue South by being the only property to address onto 2nd Avenue South between East 25th Street and East 26th Street.
8. The structure is significant for it helps provides context for Kenzo Tange's 1974 Arts Building. The Tange Building is currently not designated; however, it is a City of Minneapolis historic landmark.
9. The structure retains its integrity. The subject property retains at least seven out of eight aspects/qualities of integrity based on the National Register evaluation.

10. The subject property does have economic value and usefulness in its current function. It can continue to provide housing for six students. The property could also serve as another residential use or nonresidential use.
11. The Comprehensive Plan encourages the preservation of neighborhood character and the built environment.
12. The City of Minneapolis City Council in 2009, revised the off-street parking regulations reducing parking requirements in general and for nonresidential structures in historic districts. A main reason to reduce off-street parking requirements for nonresidential structures in historic districts is to limit the number of structures for off-street parking.
13. In 1974, the City Council required the MSFA to construct a structured parking lot rather than a surface parking lot because it would require less demolition of residential structures.
14. Staff is unaware of the City of Minneapolis Heritage Preservation Commission approving a demolition of a contributing structure of a historic district or a landmark for approval of a surface parking lot.
15. In 2002, the Heritage Preservation Commission denied the demolition of 2535 2nd Avenue South and the construction of a surface parking lot.
16. The applicant has not demonstrated the need of additional off-street parking.

I. STAFF RECOMMENDATION

CPED recommends that the Heritage Preservation Commission **adopt** staff findings and **deny** the demolition application of the property at 2538 2nd Avenue South.

J. ATTACHMENTS

- A. Maps, Aerials, and Images
- B. Application
- C. National Register Bulletin: Integrity Evaluation
- D. News articles and press releases
- E. HPC Memo MCAD Project 10.14.2008
- F. Communication with Applicant
- G. Zoning Code Information
- H. Phase 1A Plan Rendering (10.14.2008):
- I. Public Comments
- J. Washburn-Fair Oaks Historic District Guidelines
- K. Secretary of Interior Guidelines for Rehabilitation: Setting