Department of Community Planning and Economic Development
Planning Division

Certificate of Appropriateness
BZH-26283

Date: March 30, 2010

Proposal: Request for Certificate of Appropriateness to replace eight wood windows and their accompanying storm windows

Applicant: Kim and Caren Stelson

Address of Property: 2200 Milwaukee Avenue

Project Name: 2200 Milwaukee Avenue Window Replacement Certificate of Appropriateness

Contact Person and Phone: Kim and Caren Stelson, 612-729-1528

Planning Staff and Phone: John Smoley, Ph.D., 612-673-2830

Date Application Deemed Complete: March 1, 2010

Publication Date: March 30, 2010

Public Hearing: April 6, 2010

Appeal Period Expiration: April 16, 2010

Ward: 2

Neighborhood Organization: Seward Neighborhood Group

Concurrent Review: n/a

Attachments:

A. Materials submitted by CPED staff – A1-A2
    a. Location map – A1
    b. 350' map – A2
    c. Milwaukee Avenue Historic District web profile – A3-A4
    d. Milwaukee Avenue Historic District Design Guidelines - A5-A8
B. Materials submitted by Applicant – B1-B46
    a. Notification letter to Council Member and neighborhood organization – B1-B4
    b. Application form – B5-B46

2200 Milwaukee Avenue, 2010, photo submitted by Applicant

CLASSIFICATION:	
Local Historic District	Milwaukee Avenue Historic District, contributing resource
Period of Significance	1884-1904
Criteria of significance	The Milwaukee Avenue Historic District is locally significant as the earliest “planned workers’ community” in Minneapolis.
Date of local designation	1975
Applicable Design Guidelines	*The Secretary of the Interior’s Standards for Treatment of Historic Properties* Milwaukee Avenue Historic District Design Guidelines (Adopted November 14, 1975, Revised March 26, 1976)

PROPERTY INFORMATION	
Current name	Stelson Residence
Historic Name	worker housing
Current Address	2200 Milwaukee Avenue
Historic Address	2224 24th St E and 2215 22nd St E
Original Construction Date	1904
Original Contractor	Gustav Lindquist
Original Architect	none
Historic Use	Residence
Current Use	Residence
Proposed Use	Residence

BACKGROUND:

The subject property is a 1.5 story residence designed in a vernacular manner located at the northeast corner of Milwaukee Avenue and 22nd St E in the center of the Milwaukee Avenue Historic District.

The Milwaukee Avenue Historic District is a contiguous two-block development of 19th century homes constructed for working class families. Originally platted as an alley, real estate agent William Ragan developed it as a street for speculative purposes in 1883. Building clusters of modest homes on small narrow lots was a method often employed for housing lower class residents in the industrial period. Milwaukee Avenue is the earliest planned workers' community in Minneapolis. Most of the original residents of Milwaukee Avenue were Scandinavian immigrants.

Representing vernacular architecture popular in the later 19th century, houses along Milwaukee Avenue were generally constructed of brick veneer on timber frame between 1884 and 1890. The houses share common architectural treatments such as uniform roof slopes, uniform separation on lots, modified flat arch windows and open front porches.

The exterior portions of the subject building contribute to the district's significance. Constructed in 1904 by Gustav Lindquist, the building was moved into the district in 1974 and is representative of vernacular architecture and development characteristic of the neighborhood.

SUMMARY OF APPLICANT'S PROPOSAL:

The Applicant wishes to replace eight existing wood windows and eight existing aluminum storm windows with eight new, aluminum clad wood windows.

PUBLIC COMMENT:

Staff has received no public comment on the project.

CERTIFICATE OF APPROPRIATENESS: Certificate of Appropriateness to replace windows

Findings as required by the Minneapolis Preservation Code:

The Planning Division of the Minneapolis Community Planning and Economic Development Department has analyzed the application based on the findings required by the Minneapolis Preservation Ordinance. Before approving a certificate of appropriateness, and based upon the evidence presented in each application submitted, the commission shall make findings based upon, but not limited to, the following:

(1) The alteration is compatible with and continues to support the criteria of significance and period of significance for which the landmark or historic district was designated.

The exterior portions of the building at 2200 Milwaukee Avenue contribute to the district's significance due to the property's representation of vernacular architecture and turn-of-the century worker housing. Regardless of what changes are made to the subject property, it will maintain its historical significance, but proposed changes may affect its integrity (i.e. the property's ability to communicate its historical significance). Since the property will retain, though impair, its integrity if the proposed alterations are made (see findings 3-5 below), the proposed alterations are compatible with and continue to support the criteria of significance and period of significance for which the historic district was designated.

(2) The alteration is compatible with and supports the interior and/or exterior designation in which the property was designated.

Section 599.200 of the Heritage Preservation Regulations state that the purpose of designation is, "…to promote the preservation of historic resources…" The exterior portions of the building at 2200 Milwaukee Avenue contribute to the district's significance. Visual and building permit evidence indicate that the wood windows date back to the building's period of significance, 1884-1904, making them historic. Replacing these historic windows, as proposed, is not compatible with and does not support the exterior designation in which the property was designated. Visual evidence indicates that the aluminum storm windows do not date back to the building's period of significance. Removal of these aluminum windows is appropriate.

(3) The alteration is compatible with and will ensure continued integrity of the landmark or historic district for which the district was designated.

Both the city of Minneapolis' Heritage Preservation Regulations and the National Register of Historic Places identify integrity as the authenticity of historic properties and recognize seven aspects that define a property's integrity: location, design, setting, materials, workmanship, feeling and association. Based upon the evidence provided below, the proposed work will impair, but not destroy, the integrity of the contributing resource.

Location: The Applicant proposes no changes to the contributing resource's location, thus the project will not impair the contributing resource's integrity of location.

Design: The Applicant proposes to replace historic wood windows with new windows of the same dimensions. Since no design changes will occur, the property will maintain its integrity of design.

Setting: The Applicant proposes no offsite changes, thus the project will not impair the contributing resource's integrity of setting.

Materials: The Applicant proposes to replace historic wood windows with new aluminum-clad wood windows which do not date back to the building's period of significance, thus the project will impair the contributing resource's integrity of materials.

Workmanship: The historic wood windows proposed for replacement have minimal evidence of historic workmanship, thus the project will not impair the contributing resource's integrity of workmanship.

Feeling: The Applicant proposes to replace historic building materials while maintaining the building's existing design. The project will not impair the contributing resource's integrity of feeling.

Association: The Applicant proposes no changes that would break the residence's association with vernacular architecture and development characteristic of the neighborhood, thus the project will not impair the property's integrity of association.

2200 Milwaukee Avenue, 1989, taken from CPED files. Note the presence of dark-colored windows.

(4) The alteration will not materially impair the significance and integrity of the landmark, historic district or nominated property under interim protection as evidenced by the consistency of alterations with the applicable design guidelines adopted by the commission.

The Milwaukee Avenue Historic District Design Guidelines highly recommend, but do not require, wood replacement windows. The Guidelines also permit aluminum replacement windows if they are finished a dark color. The Applicant is proposing to remove white aluminum storm windows, in accordance with the Guidelines. The Applicant is also proposing to have the aluminum cladding of the wood replacement windows be painted white, to match the existing, white-painted windows on the house. This white color is not in compliance with the guidelines. Photographs of the house taken in 1989 indicate that the home possessed dark brown windows. Since then, they have been painted white. Installation of white aluminum will encourage the maintenance of a window color that conflicts with the Guidelines, as aluminum cladding is not designed to be repainted.

(5) The alteration will not materially impair the significance and integrity of the landmark, historic district or nominated property under interim protection as evidenced by the consistency of alterations with the recommendations contained in The Secretary of the Interior's Standards for the Treatment of Historic Properties.

The Applicant is conducting a rehabilitation of the subject property. The proposed project does not follow the rehabilitation guidelines of *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The application indicates that the owners wish to replace the windows to improve their building's energy efficiency. The rehabilitation guidelines of *The Secretary of the Interior's Standards for the Treatment of Historic Properties* do not recommend replacing windows solely because of peeling paint, broken glass, stuck sash, and high air infiltration. These conditions, in themselves, are no indication that windows are beyond repair. Yet these Standards acknowledge that energy efficiency is an appropriate consideration in the rehabilitation of historic buildings. The rehabilitation guidelines of *The Secretary of the Interior's Standards for the Treatment of Historic Properties* recommend making windows weathertight by re-caulking and replacing or installing weatherstripping. These actions also improve thermal efficiency. The guidelines do not recommend replacing historic windows, as the Applicant is proposing, rather than maintaining the sash, frame, and glazing. No test of the energy efficiency of the existing windows was performed. Generalized statistics for "…many older homes with original windows" do not distinguish between windows made of metal, which readily conducts heat, and wood, which has a much lower rate of conduction; the density of the window materials; the presence or absence of storm windows; and the installation or lack of weather stripping.

(6) The certificate of appropriateness conforms to all applicable regulations of this preservation ordinance and is consistent with the applicable policies of the comprehensive plan and applicable preservation policies in small area plans adopted by the city council.

Action 8.1.1 of the Minneapolis Plan for Sustainable Growth indicates that the City shall protect

historic resources from modifications that are not sensitive to their historic significance. The project will modify the building in ways that are insensitive to its historical character, as discussed in items 4 and 5 above.

Comprehensive plan policy 8.1 states that the City will, “Preserve, maintain, and designate districts, landmarks, and historic resources which serve as reminders of the city's architecture, history, and culture.” The proposed work will not help preserve the subject property and will result in the wholesale removal of serviceable, historic wood windows.

Policy 8.7 of the Minneapolis Plan for Sustainable Growth notes that the City shall create a regulatory framework and consider implementing incentives to support the ethic of “reduce, reuse, and recycle” and revitalization for buildings and neighborhoods. Action 8.7.6 states that the City shall encourage the recycling and reuse of building materials from demolitions and remodels in order to conserve natural resources and remove material from the waste stream. The replacement and disposal of the existing windows does not comply with this policy and action item.

The subject property lies within no adopted small area plan area.

(7) Destruction of any property. Before approving a certificate of appropriateness that involves the destruction, in whole or in part, of any landmark, property in an historic district or nominated property under interim protection, the commission shall make findings that the destruction is necessary to correct an unsafe or dangerous condition on the property, or that there are no reasonable alternatives to the destruction. 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 property a reasonable opportunity to act to protect it.

The project does not include the destruction of the subject property.

Before approving a certificate of appropriateness, and based upon the evidence presented in each application submitted, the commission shall make findings that alterations are proposed in a manner that demonstrates that the Applicant has made adequate consideration of the following documents and regulations:

(8) Adequate consideration of the description and statement of significance in the original nomination upon which designation of the landmark or historic district was based.

The Applicant is proposing to install windows whose dimensions match those of the existing historic wood windows and to remove aluminum storm windows that do not date back to the district’s period of significance. These proposed changes reflect adequate consideration of the significance of this worker housing historic district.

(9) Where applicable, Adequate consideration of Title 20 of the Minneapolis Code of Ordinances, Zoning Code, Chapter 530, Site Plan Review.

Title 20 of the Minneapolis Code of Ordinances, Zoning Code, Chapter 530, Site Plan Review does not regulate the replacement of windows within existing window openings.

(10) The typology of treatments delineated in the Secretary of the Interior's Standards for the Treatment of Historic Properties and the associated guidelines for preserving, rehabilitating, reconstructing, and restoring historic buildings.

As discussed in finding #5, the application is not in strict compliance with the rehabilitation guidelines of *the Secretary of the Interior's Standards for the Treatment of Historic Properties.*

Before approving a certificate of appropriateness that involves alterations to a property within an historic district, the commission shall make findings based upon, but not limited to, the following:

(11) The alteration is compatible with and will ensure continued significance and integrity of all contributing properties in the historic district based on the period of significance for which the district was designated.

The alteration may remove historic materials from one residence in the center of the historic district. This removal will unnecessarily contribute to an erosion of historic materials in the district.

(12) Granting the certificate of appropriateness will be in keeping with the spirit and intent of the ordinance and will not negatively alter the essential character of the historic district.

The spirit and intent of the City of Minneapolis' Heritage Preservation Regulations is to preserve historically significant buildings, structures, sites, objects, districts, and cultural landscapes of the community while permitting appropriate changes to be made to these properties. The property owners have requested they be allowed to replace serviceable, historic wood windows without demonstrating the cost, environmental toll, or compatibility of new windows versus rehabilitation of the existing windows.

(13) The certificate of appropriateness will not be injurious to the significance and integrity of other resources in the historic district and will not impede the normal and orderly preservation of surrounding resources as allowed by regulations in the preservation ordinance.

Approval of this Certificate of Appropriateness may impede the normal and orderly preservation of surrounding resources within the district and City at large. The Applicant does not contend that the existing windows are beyond repair. The application relies upon generalized statistics of the energy efficiency of historic wood windows provided by the sales division of a national window replacement manufacturer. The Applicant does not intend to replace all existing windows in the home. No explanation is given as to how the other windows

remain energy efficient and what effect the partial replacement of existing windows will have on the general energy savings statistics offered in the application.

STAFF RECOMMENDATION

CPED-Planning recommends that the Heritage Preservation Commission **adopt** staff findings and **approve** the Certificate of Appropriateness to replace eight wood windows and their accompanying storm windows subject to the following conditions:

1. Aluminum cladding shall be finished in a dark color.
2. CPED-Planning Preservation Staff shall review and approve the final plans and elevations prior to building permit issuance.