### AGENDA CITY OF MAPLEWOOD HERITAGE PRESERVATION COMMISSION Thursday, September 8, 2022 7:00PM

City Council Chambers, Maplewood City Hall

### A. ROLL CALL

### B. APPROVAL OF AGENDA

### C. APPROVAL OF MINUTES

1. July, 2022

### D. NEW BUSINESS

- 1. 106 Review of the American Cooperative at Lake Phalen
- 2. Review Annual report planning document
- 3. Ramsey County Poor Farm Water Tower

### E. UNFINISHED BUSINESS

- 1. Demo application (TBD)
- 2. Update on St. Jerome's Local Designation
- 3. New board member recruitment update (1 candidate, archaeology background)

### F. VISITORPRESENTATIONS

1. Maplewood Area Historical Society Update

### G. ADJOURNMENT

### RULES OF CIVILITY FOR THE CITY COUNCIL, BOARDS, COMMISSIONS AND OUR COMMUNITY

Following are rules of civility the City of Maplewood expects of everyone appearing at Commission Meetings - elected officials, staff and citizens. It is hoped that by following these simple rules, everyone's opinions can be heard and understood in a reasonable manner. We appreciate the fact that when appearing at Commission meetings, it is understood that everyone will follow these principles:

- Speak only for yourself, not for other Commission members or citizens unless specifically tasked by your colleagues to speak for the group or for citizens in the form of a petition.
- Show respect during comments and/or discussions, listen actively and do not interrupt or talk amongst each other.
- Be respectful of the process, keeping order and decorum. Do not be critical of Commission members, staff or others in public.
- Be respectful of each other's time keeping remarks brief, to the point and non-repetitive.

### MINUTES CITY OF MAPLEWOOD HERITAGE PRESERVATION COMMISSION Thursday, July 14, 2022 7:00PM

City Council Chambers, Maplewood City Hall

# DRAFT

Α.	ROLL CALL	DI
	Chair Bob Cardinal	Present
	Vice Chair Richard Currie	Absent
	Commissioner J. DeMoe	Present
	Commissioner John Gaspar	Present
	Commissioner David Hughes	Present
	Commissioner Barbara Kearn	Present
	Councilmember Villavicencio	Present
	Staff Joe Sheeran, Comms Mgr	Present

### B. APPROVAL OF AGENDA

B. Kearn motions to approve, JV DeMoe 2<sup>nd</sup>, passes on voice vote no nays

### C. APPROVAL OF MINUTES

1. June, 2022 -- J Gasbpar motions to approve, JV DeMoe 2<sup>nd</sup>, passes on voice vote no nays

### D. NEW BUSINESS

- 1. N. Fire Station Open House
- 2. Historic Designation FAQ's

### E. UNFINISHED BUSINESS

- 1. Demo application
- 2. New board member recruitment

### F. VISITORPRESENTATIONS

1. Maplewood Area Historical Society Update

### G. ADJOURNMENT

### HERITAGE PRESERVATION COMMISSION STAFF REPORT Meeting Date September 8, 2022

REPORT TO:	HPC Commiss	sioners				
REPORT FROM:	REPORT FROM: Joe Sheeran, Staff Liaison					
PRESENTER:	Joe Sheeran					
AGENDA ITEM:	Review the architecture/History Survey Report American Cooperative on Lake Phalen to fulfil the 106 process.					
Action Requested:	✓ Motion	Discussion	Public Hearing			
Form of Action:	Resolution	Ordinance	✓ Contract/Agreement	Proclamation		

### Policy Issue:

Review the Architecture/History Survey report for the area impacted by the construction of American Cooperative on Lake Phalen.

### **Recommended Action:**

Motion to concur that no historic resources were identified within the Area of Potential Effect for the American Cooperative on Lake Phalen.

### **Fiscal Impact:**

Is There a Fiscal Impact? ✓ No □ Yes, the true or estimated cost is enter amount or \$0.00. Financing source(s): □ Adopted Budget □ Budget Modification □ New Revenue Source □ Use of Reserves □ Other: Click here to enter other source or n/a.

### Strategic Plan Relevance:

- □ Community Inclusiveness
   □ Financial & Asset Mgmt
   □ Integrated Communication
   □ Operational Effectiveness
- ✓ Environmental Stewardship
- ✓ Targeted Redevelopment

Click here to enter strategic plan relevance.

### **Background:**

Grammercy Development is planning to construct a four-story, 61-unit, senior housing cooperative across from Lake Phalen in Maplewood, Ramsey County, Minnesota. The project, called the "American Cooperative on Lake Phalen" includes funding from the Department of Housing and Urban Development (HUD) and is therefore considered an "undertaking" as defined under Section 106 of the Historic Preservation Act of 1966.

St. Paul-based Pigeon Consulting, evaluated potential historic resources within the Area of Potential Effect. No historic resources were identified. Nienow Cultural Consultants completed a Phase 1a Archeological Literature Review. No further archeological evaluation was recommended. The Minnesota State Historic Preservation Office concurred with these findings. The Architecture/History survey report, Phase 1a, and SHPO concurrence are provided here for your review.

### Attachments:

American Cooperative on Lake Phalen Section 106 Submission for the Maplewood HPC Letter of Concurrence



Via Email

16 June 2022

## MAPLEWOOD HERITAGE PRESERVATION COMMISSION

Maplewood City Hall 1830 East County Road B Maplewood, Minnesota 55109

Dear Maplewood Heritage Preservation Commission

Grammercy Development is planning to construct a four-story, 61-unit, senior housing cooperative across from Lake Phalen in Maplewood, Ramsey County, Minnesota. The project, called the "American Cooperative on Lake Phalen" includes funding from the Department of Housing and Urban Development (HUD) and is therefore considered an "undertaking" as defined under Section 106 of the Historic Preservation Act of 1966 (54 U.S.S. § 306108) and its implementing federal regulations, 36 CFR Part 800.

Pigeon Consulting, a Saint Paul based historical consultant, identified an Area of Potential Effect for the project and evaluated potential historic resources within the APE. No historic resources were identified. Nienow Cultural Consultants completed a Phase 1a Archeological Literature Review. No further archeological evaluation was recommended.

The Minnesota State Historic Preservation Office concurred with these findings. The Architecture/History survey report, Phase 1a, and SHPO concurrence are provided here for your review. Please respond to this submission with any comments within 30 days of receipt of this letter.

Please do not hesitate to contact me with any questions.

Sincerely,

Samatata

Tamara Halvorsen Principal and Co-Founder tamara@pigeonconsulting.com



June 14, 2022

VIA E-MAIL

Tamara Halvorsen Pigeon Consulting 2395 University Avenue West, Suite 206 Saint Paul MN 55114

RE: American Cooperative on Lake Phalen Maplewood, Ramsey County SHPO Number: 2022-1358

Dear Ms. Halvorsen,

Thank you for initiating consultation with our office regarding the above-referenced project. Information received in our office via e-mail on May 6, 2021 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800).

Although not clearly stated in your May 6<sup>th</sup> letter, we understand that Pigeon Consulting has been authorized by the federal applicant, Colliers Mortgage, to initiate Section 106 consultation with our office in accordance with the U.S. Department of Housing and Urban Development's (HUD) memorandum "Authorization of MAP- and OHP- approved Lenders and Their Authorized Representatives to Initiate Section 106 Consultation for HUD Office of Housing Programs" (March 18, 2021).

We have completed a review your letter dated May 6, 2021, a submission which included the report titled *Architecture/History Survey Report and Archaeological Phase IA Report, American Cooperative on Lake Phalen* (4/27/2022) in support of your No Historic Properties Affected Section 106 finding for the proposed undertaking.

Although we agree that the level of documentation submitted on May 6<sup>th</sup> is sufficient to complete our review of this particular federal undertaking at this time, we recommend for future Section 106 submissions to please include the following as documentation in support of determinations and findings pursuant to 36 CFR 800.3-5:

- Federal applicant or designee cover letter clearly stating in narrative: the federal undertaking, the Area of Potential Effect (APE), summary results of efforts to identify historic properties within the APE, summary assessment and finding of effect, if applicable, and results of consultation with other consulting parties, if any, and public notification;
- Site Plan and Elevation Drawings for proposed new construction; and
- Any other documentation which you believe relevant to Section 106 determinations and findings.

Our comments on the May 6<sup>th</sup> submission are provided below.

#### Define Federal Undertaking and Determine the Area of Potential Effect

The report defines the federal undertaking as the proposed construction of a new four-story, senior residential cooperative building and associated site improvements and landscaping on a currently vacant site.

Based upon our understanding of the scope and nature of the proposed federal undertaking, we agree that your definition of the Area of Potential Effect (APE), as defined in narrative on pages 4-5 and documented on Figure 3 of the report, is appropriate to take into account potential direct and indirect effects of the proposed undertaking.

### **Identification of Historic Properties**

### Archaeology

We agree with your conclusion, as supported by the Phase IA literature review (pp. 13-26 of the report), that there are no recorded archaeological sites in the APE, that the likelihood of intact archaeological sites is low, and, therefore, an archaeological field survey is not warranted for the undertaking as it is currently proposed.

### Historic/Architectural

Based upon information provided to our office at this time, we agree with the results of identification efforts, as summarized on page 10 of the survey report, with additional clarification based upon our records review:

- There are no historic properties listed in the National Register of Historic Places (NRHP) within the APE;
- Although the previously determined NRHP-eligible historic property Phalen Park [RA-SPC-10805], specifically its contributing Phalen Park East Short Drive [RA-XXX-001], is in the vicinity of the proposed federal undertaking, it is not within the APE as it is currently defined;
- One (1) property, located at 1870 East Shore Drive, was constructed in 2012 and not subject to survey and inventory; and
- That no further intensive level survey and evaluation (Phase II) is warranted for the **Parkview Court Apartments [RA-MWC-328]** due to lack of historic significance under current contexts.

### **Finding of Effect**

Accordingly, we concur with your finding that **no historic properties** will be affected by the undertaking, as it is currently proposed.

### **Consulting Parties**

We assume that the federal applicant has invited the Maplewood Heritage Preservation Commission to participate in the Section 106 review of the proposed undertaking, and notified consulting parties, if any, as well as the public, pursuant to 36 CFR 800.4(d)(1). Please notify our office if these assumptions are incorrect.

Feel free to contact me if you have any questions regarding our review. I can be reached at (651) 201-3290 or by e-mail at sarah.beimers@state.mn.us.

Sincerely,

Sarang. Barners

Sarah J. Beimers Environmental Review Program Manager

Cc via email:

Ray Stiles and Cindy Mohs, U.S. Department of Housing and Urban Development Michael Bisanz, Colliers Mortgage





# ARCHITECTURE/HISTORY SURVEY REPORT AND ARCHEOLOGICAL PHASE IA REPORT

American Cooperative on Lake Phalen

Prepared on behalf of Colliers Mortgage for the Department of Housing and Urban Development.

April 27, 2022

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# **EXECUTIVE SUMMARY**

Grammercy Development is planning to construct a four-story, 61-unit, senior housing cooperative on Lake Phalen in Maplewood, Minnesota. The project, called the "American Cooperative on Lake Phalen" includes funding from the Department of Housing and Urban Development (HUD) and is therefore considered an "undertaking" as defined under Section 106 of the Historic Preservation Act of 1966 (54 U.S.S. § 306108) and its implementing federal regulations, 36 CFR Part 800.

Colliers Mortgage, which is underwriting the project, hired Pigeon Consulting, a historical consultant based in Saint Paul, to define the Area of Potential Effect and complete a history/architecture survey of properties within the APE that were constructed prior to 1977. Tamara Halvorsen of Pigeon Consulting meet the Secretary of the Interior's Professional Qualification Standards in History and Architectural History. Nienow Cultural Consultants (NCC) completed the Phase Ia Archeological Literature Review; Jeremy Nienow, Ph.D., RPA meets the Secretary of the Interior's Professional Qualification Standards in Archeology.

The Area of Potential Effect (APE) was determined based on the topography, vegetation, and transportation arteries surrounding project site, as these physical conditions impact the likelihood of the proposed project having physical, visual, and auditory effects on adjacent properties. The APE was confirmed with Sarah Biemers of the Minnesota State Historic Preservation Office via email and during a phone call with Tamara Halvorsen of Pigeon Consulting on April 18, 2022.

There are three properties located within the APE:

- None of the properties are currently listed in the National Register of Historic Places;
- One (1) of the properties surveyed was evaluated at the reconnaissance level and was not recommended as eligible for the National Register of Historic Places;
- One (1) of the properties was constructed after 1977 and was not evaluated;
- One (1) of the properties is a vacant lot.

NCC reviewed known archeological sites within a two-mile radius of the project site and believes that there is low potential for prehistoric or historic archeological sites. No further research is recommended. The full Phase 1a Archeological Literature Review can be found in Appendix A of this report.

Pigeon Consulting's recommendation is that there are **No Historic Properties** within the APE.

I certify that this investigation was conducted and documented according to the Secretary of the Interior's Standards and Guidelines and that the report is complete and accurate to the best of my knowledge.

Camatata\_\_\_\_

Signature of Principal Investigator

April 27, 2022

# **1.0 RESEARCH DESIGN AND METHODOLOGY**

# 1.1 **OBJECTIVES**

Grammercy Development is planning the development of a 61-unit senior housing development, called the American Cooperative on Lake Phalen, in Maplewood, Minnesota. The project, which is being underwritten by Colliers Mortgage, includes funding from the Department of Housing and Urban Development (HUD) and is therefore considered an "undertaking" as defined under Section 106 of the Historic Preservation Act of 1966 (54 U.S.S. § 306108) and its implementing federal regulations, 36 CFR Part 800.

The four-story building will have a flat roof and below-grade parking and significant landscaping, including an outdoor terrace located along East Shore Drive. The project site is irregularly shaped with topography that slopes toward lake Phalen.



Figure 1. North view of the proposed four-story, 61-unit, senior housing development, The American Cooperative on Lake Phalen. Rendering by Kaas Wilson Architects, courtesy of Colliers Mortgage.

Colliers Mortgage hired Pigeon Consulting, a historical consultant based in Saint Paul, to define the Area of Potential Effect and complete a history/architecture survey of properties within the APE that

were constructed prior to 1977. Nienow Cultural Consultants (NCC) completed the Phase 1a Archeological Literature Review.

The objective of the survey and Phase 1a are to identify and document historical, architectural, and archeological resources within the project's APE to determine if the undertaking has an adverse effect on historic properties.

# **1.2 AREA OF POTENTIAL EFFECT**

The Area of Potential Effect was developed based on existing site conditions, including adjacent uses, site topography, vegetation and landscaping, and transportation corridors. The subject property is a triangular shaped site fronting East Shore Drive North. The site is located between two large apartment complexes, the Parkview Court Apartments (RA-MWC-328) to the southwest and the Shores of Lake Phalen, an assisted living facility, to the northeast.



Figure 2. Project site shown in yellow.

The APE, which is shown in Figure 3, includes the properties immediately to the north, northeast, west, and southwest of the project site, as these properties are most likely to be visually impacted by the new construction. The National Register of Historic Places-eligible Phalen Park (RA-SPC-10805) is located immediately outside of the western boundary of the APE.

Architectural historian Tamara Halvorsen, from Pigeon Consulting, walked the area around the subject property to identify the APE.



Figure 3. Area of Potential Effect. The project site is marked by the yellow triangle.

## **1.3 PREVIOUSLY SURVEYED PROPERTIES WITHIN THE APE**

There are no previously surveyed properties within the APE. . The National Register of Historic Placeseligible Phalen Park (RA-SPC-10805) is located immediately outside of the western boundary of the APE.

# **1.4 RELEVANT HISTORIC CONTEXTS**

The following historic contexts and historic resource surveys provided a basis to evaluate properties within the APE:

• Rush Line Bus Rapid Transit Project, Ramsey County, (2019-0985), Phase II Evaluation Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001), Mead & Hunt and Mississippi Valley Archeology Center, 2020.

In addition to reviewing the Rush Line Phase II Evaluation, Pigeon Consulting conducted research into the history of the Parkview Court Apartments (RA-MWC-328) and the suburban "club-type apartment" that was popular throughout the United States in the 1960s.

The Parkview Court Apartments were constructed in 1965 on the north shore of Lake Phalen. The twin apartment buildings front a central courtyard that includes a patio, fountain, and landscaping. When the apartments opened, they were touted as "a dramatically different experience in apartment living," specifically, they were "adults only" rentals that aimed to offer "quiet elegance" and "true resort style living" with amenities such as air conditioning, wall-to-wall carpeting, fireplaces, and large private balconies.<sup>1</sup>

The Parkview Court Apartments are an example of the low-rise, medium-density, "club-type apartments" that developers constructed in suburbs throughout the United States in the 1960s. The club-type apartments were a variation of the garden apartment that was popular from the 1930s through the 1960s. The garden apartment was

a low-slung complex...in which architects and developers arranged apartments in multiple, small, wood-frame buildings of one to three stories on a spacious landscaped campus. Typically built on greenfield sites in the outer sections of cities or in suburbs -and often, as a result of zoning regulations, clustered along major roads – they included ample automobile

<sup>&</sup>lt;sup>1</sup> Parkview Court Apartments, advertisement, *Star Tribune*, Sunday, August 21, 1965, 5.

parking along interior drives, on surface lots, and in banks of attached individual garages...Expressions ranged from stucco-clad Moderne to Tudor Revival, but the majority assumed a cloak of streamlined Colonial Revival, especially after World War II.<sup>2</sup>

The club-type complex was designed for and marketed to "two robust new market segments for housing beginning in the fifties and early sixties; well-pensioned 'oldsters' enjoying comfortable, independent retirements; and especially, a burgeoning cohort of well-educated and-employed singles, young men and women living out on their own before marriage."<sup>3</sup> To appeal to these new renters, developers

Added a greater variety of unit types, including apartments with previously unheard of features in mass housing, such as ensuite bathrooms for every bedroom...elevators, balconies, patios, and elaborate, often lush, landscaping. They budgeted for marketing and bought display advertisements in newspapers. And they offered amenities previously found only in a small handful of higher-end, planned single-family subdivisions: swimming pools, tennis courts, and clubhouses, along with staff to program social activities. Complexes geared to singles offered hot tubs, hootenannies, and co-ed socials. Those for retirees...included meeting rooms, hobby rooms, classrooms [and more] ..."<sup>4</sup>

When John E. Blomquist, Inc., a Saint Paul-based real estate firm, advertised the Parkview Court Apartments in the August 21, 1966, issue of the *Star Tribune*, the complex was one of three apartments advertised on page 5 of the newspaper. All of the advertisements were for suburban club-style complexes that catered to adults.

As the advertisement in Figure 4 shows, the "Beautiful Old Shakopee Village Wooded Apartment Homes" and "The Colony Communities" in Edina and Richfield both offered extensive amenities that surpassed those offered by the Parkview Court Apartments, including heated garages, patios and balconies, landscaped lawns, swimming pools, color TV antennas, security systems, saunas, exercise rooms, and community centers.

With their luxury amenities, these properties more fully exemplify the club-style apartment building type than does the Parkview Court Apartments.

<sup>&</sup>lt;sup>2</sup> Matthew Gordon Lasner, "Multifamily Private Housing Since World War II," SAH Archipedia, https://saharchipedia.org/essays/TH-01-ART-005

<sup>&</sup>lt;sup>3</sup> Matthew Gordon Lasner, "The Complex: Social Difference and the Suburban Apartment in Postwar America," in *Making Suburbia: New Histories of Everyday America*, eds. John Archer, Paul J.P. Sandul, and Katherine Solomonson (Minneapolis: University of Minnesota Press, 2015), 343.

<sup>&</sup>lt;sup>4</sup>Matthew Gordon Lasner, "Multifamily Private Housing Since World War II," SAH Archipedia, https://saharchipedia.org/essays/TH-01-ART-005



Figure 4. Advertisement for suburban club-style apartments in the August 21, 1966, issue of the Star Tribune. Courtesy of newspapers.com

## 1.5 METHODS

## **Field Survey**

Architectural historian, Tamara Halvorsen, from Pigeon Consulting walked the APE to identify, document, and photograph properties constructed prior to 1977 according to the Secretary of the Interior's Standards for Identification and Evaluation, and the Minnesota State Historic Preservation Office's *Historic and Architectural Survey Manual.*<sup>5</sup> Tamara meets the Secretary of the Interior's Professional Qualification Standards in History and Architectural History.

### Research

Preliminary research was conducted to determine if any of the properties within the APE met eligibility requirements for the National Register of Historic Places (NRHP). To be eligible for listing in the NRHP, a property must be at least 50 years of age and considered significant under at least one of the following National Register Criteria:

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of significant persons in our past; or
- C. Embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Has yielded or may be likely to yield, information important in history or prehistory.

Research was conducted at the following repositories: the collections of the Minnesota Historical Society, Ramsey County Property Records, and the University of Minnesota. Primary sources included historic and current city parcel maps, and newspaper articles.

<sup>&</sup>lt;sup>5</sup> The reconnaissance survey documented properties largely based on distinctive architecture identified during fieldwork, associations identified through the existing relevant historic contexts, and from limited site-specific research.

# 2.0 SURVEY RESULTS

There are three properties located within the APE. One of them was constructed prior to 1977 and was evaluated as part of the Architecture/History survey.

- None of the properties are currently listed in the National Register of Historic Places;
- One (1) of the properties surveyed was evaluated at the reconnaissance level and was not recommended as eligible for the National Register of Historic Places;
- One (1) of the properties was constructed after 1977 and was not evaluated;
- One (1) of the properties is a vacant lot.

A new history/architecture survey form was prepared for one (1) of the properties. The form can be found in Appendix B of this report.

## TABLE 1. PROPERTIES WITHIN THE AREA OF POTENTIAL EFFECT

INVENTORY	ADDRESS	HISTORIC	YEAR	NRHP ELIGIBILITY	
NUMBER		NAME	CONSTRUCTED	RECOMMENDATION	
RA-MWC-328	1880-1900 East Shore Drive N	Parkview Court	1965	Recommended Not	
KA-IVIVC-320		Apartments	1905	Eligible	
N/A	1870 E. Shore Drive	The Shores of	2012	Not Inventoried	
N/A	1670 E. SHOTE DITVE	Lake Phalen	2012		

NCC reviewed known archeological sites within a two-mile radius of the project site and determined that the project site has low potential for prehistoric or historic archeological sites; NCC does not recommend any further archaeological investigation. The full Phase 1A Archeological Literature Review can be found in Appendix A of this report.

# **3.0 RECOMMENDATIONS**

Pigeon Consulting's recommendation is that there are **No Historic Properties** within the APE.

# 4.0 **BIBLIOGRAPHY**

Lasner, Matthew Gordon. "The Complex: Social Difference and the Suburban Apartment in Postwar America," in *Making Suburbia*: *New Histories of Everyday America*, eds. John Archer, Paul J.P. Sandul, and Katherine Solomonson (Minneapolis: University of Minnesota Press, 2015.

-----. "Multifamily Private Housing Since World War II," SAH Archipedia, <u>https://sah-archipedia.org/essays/TH-01-ART-005</u>, accessed April 21, 2022.

Mead & Hunt Phase II Evaluation Lake Superior & Mississippi Railroad Corridor Historic District. Saint Paul to White Bear Lake Segment (XX-RRD-NPR001), prepared for the Rush Line Bus Rapid Transit Project, Ramsey County (2019-0985), 2020.

McAelster, Virginia and Lee. A Field Guide to American Houses. New York: Alfred A. Knopf, Inc., 1984.

Ramsey County Beacon Interactive Property Map, <u>https://beacon.schneidercorp.com/application.aspx?AppID=959&LayerID=18852&PageTypeI</u> <u>D=4&PageID=8471&KeyValue=162922310028</u>, accessed April 21, 2022.

Star Tribune, August 21, 1965. Newspapers.com

# APPENDIX A: PHASE IA LITERATURE REVIEW BY NIENOW CULTURAL CONSULTANTS



Nienow Cultural Consultants, LLC 200 Plato Blvd. East St. Paul, MN 55107

Friday, April 22, 2022

Tamara Halvorsen Pigeon Consulting 831 Nebraska Avenue West St. Paul, MN 55117

RE: Phase Ia Archaeological Literature Review for American Cooperative on Lake Phalen

Nienow Cultural Consultants LLC (NCC) was asked to complete an Archaeological Literature Review for a privately owned parcel located approximately 180 feet north of Lake Phalen, 20 feet west of East Shore Drive, and 366 feet southeast of Frost Avenue (Figure 1). To complete this review, NCC consulted with the Minnesota State Historic Preservation Office (SHPO) as well as the Minnesota Office of the State Archaeologist (OSA) to review archaeological sites reported within a two-mile radius of the project area. Archaeological literature review methods were further guided by the 2005 SHPO *Manual for Archaeological Projects in Minnesota*. Beyond this, the archaeological Principal Investigator's expert knowledge of the Upper Midwest was used to inform and make any recommendations relative to the project. As this review was completed on private property and consists solely of a literature review, no archaeological license was required to complete it.

An archaeological literature review examines standard, best practice, archaeological, and historical references to summarize what is archaeologically known about a given project area prior to any fieldwork. These are generally completed to assess survey needs, appropriate survey methods, where sites could be located, and previous terrain disturbance and land-use. Information and results related to this review are presented below, along with a recommendation on whether archaeological survey (Phase Ib) should be completed.

## **Project Location**

The property is in the NE <sup>1</sup>/<sub>4</sub> of the SW <sup>1</sup>/<sub>4</sub> of Section 16 in Township 29N, Range 22W, Maplewood, Ramsey County Minnesota (Figure 2). The parcel is located in Archaeological Region 4e: Central Deciduous Lakes (Anfinson 1990:145-151). This region is defined by a "patchwork" of glacial plains, oak forests, and lakes (Anfinson 1990:147-148). About 1000 years before present, the region was believed to be abundant in fish, waterfowl, game animals, wild rice, and acorns (Anfinson 1990:148). However, the terrain and climate were believed to not be ideal for prehistoric agriculture (Anfinson 1990: 148).

## Methods

Research for this report started on April 19, 2022. Covid protocols prohibiting research visits were in place at the State Historic Preservation Office (SHPO) and Office of the State Archaeologist (OSA) (the state agencies responsible for maintaining Minnesota's archaeological and architectural data) during this project. All research was instead completed with the digital resources provided by both agencies. NCC submitted a database search request to SHPO for all archaeological and architectural sites in their files

within a 2-mile radius. Additionally, NCC reviewed the Minnesota Office of the State Archaeologist's web portal for archaeological site data. A review of historical aerial imagery surrounding the project area from the Borchert Map Library's Minnesota Historical Aerial Photographs Online, Borchert Map Library's digitized plat books, historic topographic maps provided by USGS, and Google Earth's Historical Imagery function was also conducted.

## Results

There are no known archaeological sites previously recorded within the project area. Three formally identified archaeological sites have been recorded within two miles of the project area, along with one alpha site (Table 1). Alpha sites are potential site leads identified via literature or mapping resources (i.e. the Andreas Atlas cited in the table below). These have not been field-verified through archaeological survey. SHPO records contained no previously recorded architectural sites within the project area.

Site Number	Site Name	Site Type/ Details	Time Period/ Cultural Tradition	T/R/S	Distance from Project Area	Reference
21RA0070	Gladstone Shops	Train Repair Facility	Post-Contact: Euro-American	T29N, R22W, S16 NE ¼ of SE ¼	0.39 Miles	(Ollila 2012) Archaeological Monitoring and Visual Assessment for the Gladstone Savanna Neighborhood Preserver and Gloster Park Project
21RA0006	Spoon Lake	Burial Mounds	Pre-Contact: Woodland Period	T29N, R22W, S16 NW ¼ of SW ¼	0.5 Miles	Lewis No. 3 Pg. 18 Winchell Pg. 266
21RA0082	Gladstone/ Gloster Privies	Privies for Former Railroad Depot	Post-Contact: Euro-American	T29N, R22W, S15 SW ¼ of SW ¼ of NW ¼	0.69 Miles	OSA Site File
21RAw	Kohlman Lake Site	Lithic Scatter	Pre-Contact: Woodland Period	T29N, R22W, S9 NE ¼ of NW ¼ of NW ¼	1.48 Miles	(Nienow 2016) Archaeological Investigations at Lake Vadnas

Table 1: Archaeological Sites near Project Area (Maplewood, Ramsey County)

One of the formally-recorded archaeological sites and one of the alpha sites are Pre-Contact in origin, specifically originating in the Woodland Period (800 B.C. to European Contact). The alpha site is an assemblage of projectile points reportedly collected by a private landowner both on and near their property near Lake Kohlman. The assemblage, named the Stanke Collection after landowner Terry Stanke, was donated to the Maplewood Area Historical Society in 1998 or 1999. Nienow Cultural Consultants viewed the collection in 2015 and determined they were crafted at various times throughout the Early to Late Woodland Period (Nienow 2016). Site 21RA0006 (Spoon Lake) is located along Highway 61 in Keller Regional Park. Two mounds were first mapped in this area in the late 19<sup>th</sup> century by T.H. Lewis, and later published by N.H. Winchell in 1911. The site was field-visited by previous state archaeologist Scott Anfinson in 2008. Two features were located during this survey which may correlate to the mounds mapped by Lewis and Winchell, but one had been heavily disturbed by borrowing, and the dimensions of the other did not match those on Lewis' map.

Two of the archaeological sites within two miles are historic in origin, related to a rail line that used to run about a tenth of a mile north of the project area, but is now the Bruce Vento Trail. Site 21RA0070 (Gladstone Shops) is the closest to the project area, just 0.39 miles to the east. This site was the location of a train repair facility constructed in 1887 to service cars running along the St. Paul and Duluth Railroad. The shops remained in operation until the early 20<sup>th</sup> century, but were majorly removed during the 1940s. The site is currently a park (Gladstone Savanna) maintained by the City of Maplewood. Site 21RA0082 (Gladstone/Gloster Privies), located a block east of 21RA0070, is the location of a privy once used for visitors of the nearby (non-extant) railroad depot. This privy was excavated in 2018.

An examination of previous mapping, aerial imagery, and satellite photography covering the project area identified no non-extant historic structures or features of archaeological interest, and no structures currently standing in the project area. A data request to SHPO also confirmed no SHPO-inventoried historic structures once stood or currently do stand within the project area. Instead, historical aerial and modern satellite imagery illustrated the presence of a mobile home park starting along Frost Ave and stretching to include a cul-de-sac through a large portion of the project area (Figures 2-3). LiDAR imagery well-illustrates the effects of grading within the project area to flatten the landscape for the foundations and asphalt drive (Figure 4). This neighborhood continued up through the early 2000s, and by 2008 all homes in the neighborhood had been removed and Maplewood-based company DeBar had been planning to build a 180-unit senior living complex on the property (Black 2010).

Foundation blocks for the homes, as well as the asphalt drives, are still visible in satellite imagery through 2011 (Figure 5), and by 2012 construction on the senior living building just north of the project area (called The Shores of Lake Phalen) had begun (Figure 6). Construction-related equipment and a subsequent temporary parking lot were located in the northeastern corner of the project area through 2016 (Figure 7). By this time, a permanent secondary parking lot has been paved just north of the project area, and the temporary lot remained but was no longer used. Asphalt paving is still visible in the project area in 2019 satellite imagery, suggesting no further removal of the mobile home neighborhood remnants has been completed (Figure 8).

### Recommendations

Based on the review of known archaeological sites within two miles, as well as information gleaned from historic topographic mapping, aerial imagery, and satellite photography, there is low potential for intact archaeological sites within the project area. While at one time this location would have been considered high potential for Pre-Contact sites for its proximity to Lake Phalen, it has since experienced extensive grading for the mid-to-late 20<sup>th</sup> century mobile home park, with half of the remnants from that neighborhood already having been removed for the construction of another senior living building north of the project area. Based on this understanding, NCC recommends no further archaeological work be completed for the project area.

With any project there is the chance of unanticipated discovery. Should archaeological materials surface during any future construction, it is advised a professional archaeologist be consulted. Minnesota Statute 307.08 protects unplatted cemeteries (including burial mounds) and issues guidelines for dealing with unexpected finds. Should human remains be encountered during earth moving activity, all work must stop, and local law enforcement must be called. If you have any additional questions or future project work, please do not hesitate to contact us.

Sincerely,

Jeremy L. Nienow, Ph.D., RPA Owner and Principal Nienow Cultural Consultants, LLC

## Works Cited

## Anfinson, Scott

1990 "Archaeological Regions in Minnesota and the Woodland Period" *The Woodland Tradition in the Western Great Lakes: Papers Presented to Elden Johnson.* Guy Gibbon ed. University of Minnesota. Publications in Anthropology No. 4. Minneapolis, Minnesota.

## Black, Sam

2010 "Maplewood taking pass on project". *Minneapolis/St. Paul Business Journal*. December 30, 2009, updated January 3, 2010. Website at https://www.bizjournals.com/twincities /stories/2010/01/04/story4.html. Accessed 19 April, 2022.

Nienow, Jeremy

2016 Archaeological Investigations at Lake Vadnais, Ramsey County, Minnesota. Completed for the North Lake Owasso Neighborhood Group by Nienow Cultural Consultants LLC.



Figure 1: 2022 Topographic map of project area (red triangle at top of image). 7.5' St. Paul East Quadrangle, 1:24,000 Scale



Figure 2: 1953 aerial image of project area (red triangle) showing mobile home park.

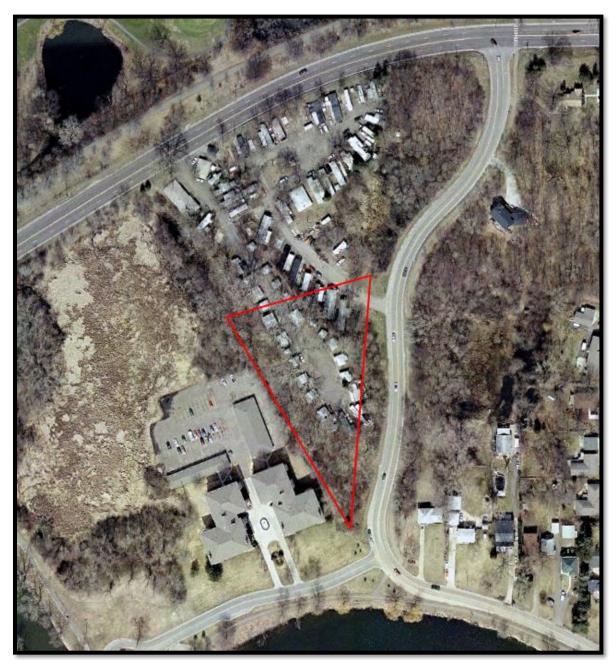


Figure 3: 2006 satellite photograph of project area (red triangle).



Figure 4: 2008 LiDAR hillshade of project area (red triangle). Note distinct grading through center of project area (LiDAR data collected by MNDNR).



Figure 5: 2011 satellite imagery of project area (red triangle). Note visible mobile home foundations and remnants of asphalt cul-de-sac.

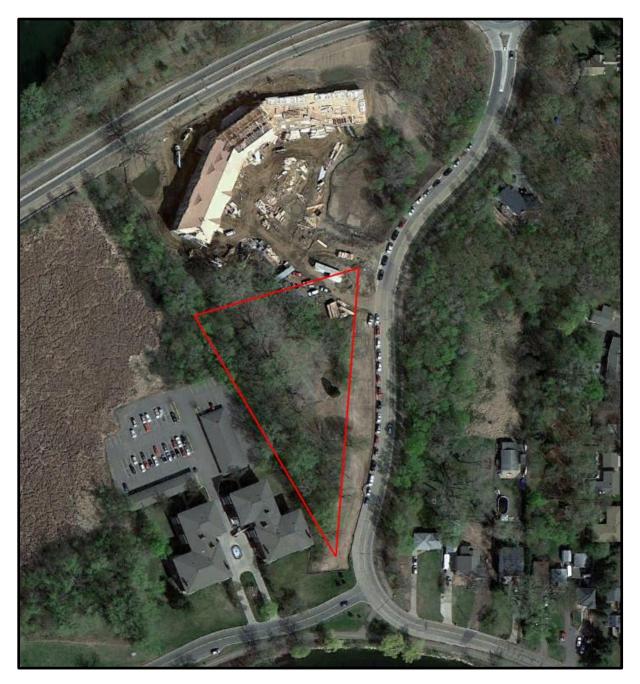


Figure 6: 2012 Satellite Image of project area showing construction of The Shores of Lake Phalen senior living building north of project area.



Figure 7: 2015 satellite photograph of project area showing remnants of temporary parking lot in northeastern corner.



Figure 8: 2019 satellite photograph of project area. Note overgrown asphalt remnants at center.

# **APPENDIX B: INVENTORY FORMS**

# Minnesota Individual Property Inventory Form



### Please refer to the Historic and Architectural Survey Manual before completing this form.

Must use Adobe Acrobat Reader to complete and save this form. Adobe Acrobat Reader can be downloaded at: https://get.adobe.com/reader/?promoid=KLXME

Street Address:	General Information						
Other Names:         Inventory No:         Associated MN Multiple Property Form (Name and Inventory No.):	Historic Name:						
Inventory No.:         Associated MN Multiple Property Form (Name and Inventory No.):         Mew or Updated Form:         Review and Compliance No.:         Street Address:         County:         Grant No.:         Location Information         Street Address:         County:         If Multiple, List All Counties:         UGS 7.5 Quad Name(s):         It output:         QurQurQur:       Qtr:         QtrQurQur:       Qtr:         QtrQurQur:       Qtr:         QtrQurQur:       Qtr:         QtrQurQur:       Qtr:         QtrQurQur:       Qtr:         QtrQurQur:       Qtr:         Subdivision:       Block(s):         Lot(s):	Other Names:						
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Property Identification Number (PIN):	Block(s):						
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Not Eligible Contributing Status:	∐ Not Eligible						

Page 1 of 3 (July 2019 Form Version)

## **Minnesota Individual Property** h

His	toric	Name:			
			-		

	e and Inventory No):
Classification	
Associated Properties (Name and Invent	tory No.):
Property Category:	Number of Resources on the Property:
	Buildings: Structures: Sites: Objects:
Function or Use	
Historic:	Current:
Function/Use Category:	Function/Use Category:
Function/Use Category (if other):	
Function/Use Subcategory:	Function/Use Subcategory:
Function/Use Subcategory (if other):	
Description	
Provide full Narrative Description on Con	ntinuation Sheet.
Architectural Style:	
Exterior Material	
Significance	
Provide full Statement of Significance on	Continuation Sheet.
Applicable National Register of Histori	ic Places Criteria:
Criterion A: Property is associated with si	ignificant events.
Criterion B: Property is associated with th	he lives of significant persons.
Criterion C: Property has significant archi	itectural characteristics.
Criterion D: Property may yield important	t information in history/prehistory.
Criteria Considerations?	No Yes If yes, describe in Statement of Significance on Continuation Sheet
Area of Significance:	Additional or Other Area(s) of Significance:
Period(s) of Significance:	
Date(s) Constructed:	
	Discuss in Statement of Significance on Continuation She

### Minnesota Individual Property Inventory Form

Historic Name:

Inventory No.:

Associated MN Multiple Property Form (Name and Inventory No):

#### Bibliography

Complete Bibliography on Continuation Sheet.

#### **Additional Documentation**

For all properties, the following additional documentation must be submitted with the inventory form. Refer to the *Historic and Architectural Survey Manual* for guidance.

1. Photographs

2. Maps

#### **Preparer's Information and Recommendation**

Preparer Name and Title:	
Organization/Firm (if applicable):	
Date Inventory Form Prepared:	
Recommended Individual Evaluation:	Recommended District Evaluation:
Eligible for the National Register	Within a National Register-Eligible District
Not Eligible for the National Register	Contributing Status:
More Information Needed for Evaluation	District Name:
	District Inventory Number:
Eligible for Local Designation	Within a Locally-Eligible District
Not Eligible for Local Designation	Contributing Status:
More Information Needed for Local Designation	District Name:
	District Inventory Number:

State Historic Preservation Office Comments (SHPO Use Only)							
Initials:		Date:					
Individual Recommendation (NRHP)							
Concur	Does Not Concur	More Information Needed					
Historic District Recommendation (NRHP)							
	Does Not Concur	More Information Needed					
Contributing/Noncontributing Status Recommendation							
Concu	r 📃 Does Not Concur	More Information Needed					
Comments:							

Page 3 of 3 (July 2019 Form Version)

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_

### **Narrative Description**

The Parkview Court Apartments complex was constructed in 1965 on the north shore of Lake Phalen. The property includes two "s" shaped apartment buildings, two rectangular parking garages, a surface parking lot, and a landscaped central courtyard. The two apartment buildings front East Shore Drive to the south; Lake Phalen is located on the opposite side of the road. To the north, east, and west, the site is covered with mature trees. Parkland and a golf course (Phalen Regional Park, RA-SPC-10850) are located to the west and south. A large residential complex is located on the parcel immediately to the northeast, and a densely platted residential neighborhood is located three blocks to the east.

The apartment buildings are each four-stories, clad in brown brick, have low-pitched hipped roofs with deeply overhanging eaves, and prominent balconies at all façades.

The primary façade of each building is divided into three visual sections. The central section includes two sets of paired casement windows at each level. To either side, the façade is slightly recessed to accommodate the balconies. A combination of swing doors, casement windows, and large fixed windows are located at each level of the façade behind the balconies. At each building, tall brick chimneys rise from the east and west hips of the roof. The secondary façades of each building follow a similar organization and rhythm.

A central drive is located between the apartment buildings. The drive splits in two around a long oval landscaped bed and an in-ground fountain, then continues toward the parking structures and surface lot at the rear of the property.

The two parking structures are both long, low rectangular buildings. They are each a single story, clad in brown brick, and have low-pitched roofs with deeply overhanging eaves. On each building, overhead garage doors line the façade facing the surface lot.

### **Statement of Significance**

The Parkview Court Apartments were constructed in 1965 on the north shore of Lake Phalen. The twin apartment buildings front a central courtyard that includes a patio, fountain, and landscaping. When the apartments opened, they were touted as "a dramatically different experience in apartment living," specifically, they were "adults only" rentals that aimed to offer "quiet elegance" and "true resort style living" with amenities such as air conditioning, wall-to-wall carpeting, fireplaces, and large private balconies. <sup>1</sup>

The Parkview Court Apartments are an example of the low-rise, medium-density, "club-type apartments" that developers constructed in suburbs throughout the United States in the 1960s. The club-type apartments were a variation of the garden apartment that was popular from the 1930s through the 1960s. The garden apartment was

<sup>&</sup>lt;sup>1</sup> Parkview Court Apartments, advertisement, *Star Tribune*, Sunday, August 21, 1965, 5.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_

a low-slung complex...in which architects and developers arranged apartments in multiple, small, woodframe buildings of one to three stories on a spacious landscaped campus. Typically built on greenfield sites in the outer sections of cities or in suburbs -and often, as a result of zoning regulations, clustered along major roads – they included ample automobile parking along interior drives, on surface lots, and in banks of attached individual garages...Expressions ranged from stucco-clad Moderne to Tudor Revival, but the majority assumed a cloak of streamlined Colonial Revival, especially after World War II.<sup>2</sup>

The club-type complex was designed for and marketed to "two robust new market segments for housing beginning in the fifties and early sixties; well-pensioned 'oldsters' enjoying comfortable, independent retirements; and especially, a burgeoning cohort of well-educated and-employed singles, young men and women living out on their own before marriage."<sup>3</sup> To appeal to these new renters, developers

Added a greater variety of unit types, including apartments with previously unheard of features in mass housing, such as ensuite bathrooms for every bedroom...elevators, balconies, patios, and elaborate, often lush, landscaping. They budgeted for marketing and bought display advertisements in newspapers. And they offered amenities previously found only in a small handful of higher-end, planned single-family subdivisions: swimming pools, tennis courts, and clubhouses, along with staff to program social activities. Complexes geared to singles offered hot tubs, hootenannies, and co-ed socials. Those for retirees...included meeting rooms, hobby rooms, classrooms [and more] ...<sup>"4</sup>

When John E. Blomquist, Inc., a Saint Paul-based real estate firm, advertised the Parkview Court Apartments in the August 21, 1966, issue of the *Star Tribune*, the complex was one of three apartments advertised on page 5 of the newspaper. All of the advertisements were for suburban club-style complexes that catered to adults.

<sup>&</sup>lt;sup>2</sup> Matthew Gordon Lasner, "Multifamily Private Housing Since World War II," SAH Archipedia, https://saharchipedia.org/essays/TH-01-ART-005

<sup>&</sup>lt;sup>3</sup> Matthew Gordon Lasner, "The Complex: Social Difference and the Suburban Apartment in Postwar America," in *Making Suburbia: New Histories of Everyday America*, eds. John Archer, Paul J.P. Sandul, and Katherine Solomonson (Minneapolis: University of Minnesota Press, 2015), 343.

<sup>&</sup>lt;sup>4</sup>Matthew Gordon Lasner, "Multifamily Private Housing Since World War II," SAH Archipedia, https://saharchipedia.org/essays/TH-01-ART-005

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_



Advertisement, Star Tribune, August 21, 1966.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_

As the advertisement shows, the "Beautiful Old Shakopee Village Wooded Apartment Homes" and "The Colony Communities" both offered extensive amenities that surpassed those offered by the Parkview Court Apartments, including:

- Heated garages
- Patios and balconies
- Landscaped lawns
- Swimming pools
- Color TV antennas

- Security systems
- Saunas
- Exercise Rooms
- Community Centers<sup>5</sup>

With their luxury amenities, these properties more fully exemplify the club-style apartment building type than does the Parkview Court Apartments. The Parkview Court Apartments are not recommended as eligible for the National Register of Historic Places under Criterion C as a representation of the 1960s club-style apartment.

Additionally, the Parkview Court Apartments are not known to be associated with events that have made a significant contribution to the broad patterns of American history, and do not appear to have significance under Criterion A. The Parkview Court Apartments are not known to be associated with persons important in the past, and therefore, do not appear to have significance under Criterion B. This property has not yielded, nor is it likely to yield, information important in prehistory or history, and therefore, does not appear to have significance under Criterion D.

The property is not recommended for further research.

### Bibliography

Lasner, Matthew Gordon. "The Complex: Social Difference and the Suburban Apartment in Postwar America," in *Making Suburbia: New Histories of Everyday America*, eds. John Archer, Paul J.P. Sandul, and Katherine Solomonson (Minneapolis: University of Minnesota Press, 2015.

-----. "Multifamily Private Housing Since World War II," SAH Archipedia, <u>https://sah-archipedia.org/essays/TH-</u> 01-ART-005, accessed April 21, 2022.

Ramsey County Beacon Interactive Property Map, <u>https://beacon.schneidercorp.com/application.aspx?AppID=959&LayerID=18852&PageTypeID=4&PageID=8471</u> &KeyValue=162922310028, accessed April 21, 2022.

Star Tribune, August 21, 1965. Newspapers.com

<sup>&</sup>lt;sup>5</sup> Advertisements, *Star Tribune*, Sunday, August 21, 1965, 5.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_

### Maps



Source: Ramsey County Beacon Interactive Property Map.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_

### Photographs



Looking west, 04/11/22. Pigeon Consulting, LLC.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_



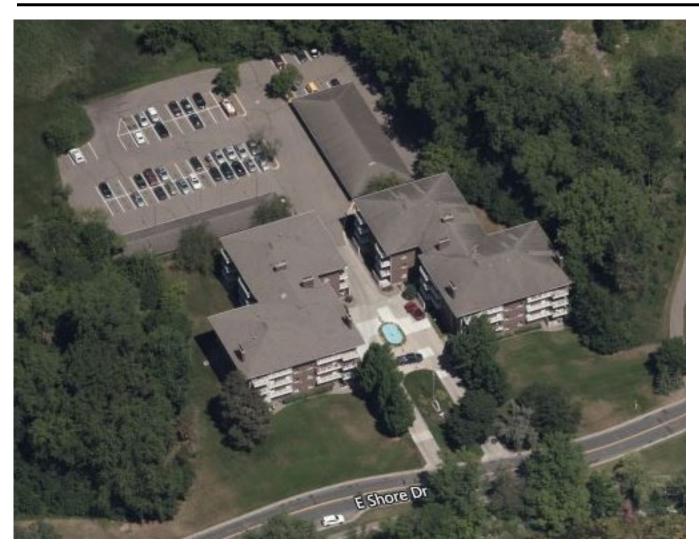
Looking north, 04/11/22. Pigeon Consulting, LLC.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_



Looking northeast, 04/11/22. Pigeon Consulting, LLC.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_



Site photograph courtesy of Ramsey County and Bing.

Associated MN Multiple Property Form (Name and Inventory No): \_\_\_\_\_\_



One of two parking garage structures, photograph courtesy of rent.com

10



Dear Ms. Halvorsen,

Thank you for the opportunity to consult on the American Cooperative on Lake Phalen project in accordance with Section 106 of the National Historic Preservation Act of 1966 (as amended).

We reviewed the "Architecture/History Survey Report" prepared by Pigeon Consulting on behalf of Colliers Mortgage and the Department of Housing and Urban Development, the Phase 1A Archeological Literature Review prepared by Nienow Cultural Consultants, and the June 14, 2022 consultation letter from the Minnesota State Historic Preservation Office.

We agree that there are no historic properties and no recorded archeological sites within the Area of Potential Effect.

Bob Cardinal, HPC Chair

September 8, 2022

**City of Maplewood Heritage Preservation Commission** 1830 County Road B East Maplewood, MN 55109 651-249-2000 www.maplewoodmn.gov HPC 2022 Annual Report

### Accomplishments:

Two new members joined the Commission.

One is a retired history teacher whose credentials fills the needs of our History member requirement.

Actively recruiting for someone from a diverse community or who has one of the professional credentials required by SHPO

Created a 3-year strategic plan, with an emphasis on Diversity Equity and Inclusion (DEI). **It includes:** 

- Creating an interactive website documenting key dates in the city's history
- Oral history of residents from diverse backgrounds on why they chose Maplewood.
- Study/evaluate historic significance of key Maplewood properties/locations
- Historical marker/interpretative signage along the LS&M Rail Road site.
- Assist the Maplewood Area Historical Society market new exhibits

Began working on the historic designation for St. Jerome's for its long support of hosting and educating several waves of immigrants and refugees.

The Commission Chair, Commission member, and Staff Liaison attended the Preserve MN Conference in Duluth in the fall of 2022.

Documented with photos and drone video the decommissioned London Fire Station before it's demolition.

Documented with photos and drone video Moose Lodge prior to the City preparing to put it on the market.

Documented with photos and drone video the Gladstone house prior to its tentative sale.

Review 106 for McCarons water treatement upgrade

Review 106 for

#### Memo from Joe S. on the Ramsey County Poor Farm water tower issue

#### FROM Ramsey County in response to inquiries:

As you may know, Ramsey County has closed the Care Center located adjacent to the barn in Maplewood. As part of closing that building, we are exploring the best options to secure the building and the property and deter unauthorized use.

One of the considerations is securing and or removing the water tower. The water tower is not in use and not needed. It has been a problem in the past with individuals climbing it, risking vandalism, graffiti, and personal injury. Without staff on site 24/7 we are concerned this unauthorized access will increase. Hence, we are exploring options. We have not made any decisions in this regard but have been getting cost estimates to assist in our analysis.

Based on this, I reached out to Michael Koop from the department of admin, SHPO to check the historic status of the water tower:

#### From M. Koop:

According to the National Register of Historic Places form that was written in 1976 for the Ramsey County Poor Farm Barn, the barn and connected silos are the only buildings/structures that are included as part of that National Register listing. There is no mention of a water tower. I checked with a SHPO colleague to see if the water tower appears in our inventory, or if our Environmental Review Program has any correspondence from Ramsey County about the potential demolition of the water tower, but I have not gotten a response yet. My hunch is that the answer to both of those questions is no.

### Follow up from M Koop 8/8/22:

Joe,

I heard back from my SHPO colleagues, and we have no information about the water tower in our inventory. As I mentioned, the water tower is not included in the National Register nomination form for the barn, so there are no state laws that require any consultation with SHPO on this matter.

Thanks,

Michael Koop