



# Appendix H

## Section 106 Supporting Materials

### H.2 Section 106 Agency Correspondence

1. Minnesota Department of Transportation (MnDOT) Cultural Resources Unit letter regarding additional inventory information in the Grand Rounds Historic District, March 11, 2014
2. Minnesota State Historic Preservation Office (MnHPO) letter responding to Grand Rounds Historic District additional inventory information received, April 11, 2014
3. US Army Corps of Engineers letter delegating authority for the Federal Transit Administration (FTA) to act as the Federal Lead Agency for Section 106 responsibilities, March 30, 2015
4. MnDOT Cultural Resources Unit letter transmitting a Section 106 Consultation Package, July 10, 2015
5. City of Robbinsdale comment letter on Section 106 Consultation Package, August 7, 2015
6. MnHPO letter regarding Section 106 Consultation Package, August 10, 2015
7. City of Golden Valley comment letter on Section 106 Consultation Package, August 10, 2015
8. City of Minneapolis comment letter on Section 106 Consultation Package, August 10, 2015
9. FTA letter transmitting Final Determination of Effect Report to MnHPO, January 20, 2016
10. City of Robbinsdale comment letter on Final Determination of Effect Report, February 17, 2016
11. City of Brooklyn Park comment letter on Final Determination of Effect Report, February 18, 2016
12. Hennepin County comment letter on Final Determination of Effect Report, February 19, 2016
13. City of Minneapolis comment letter on Final Determination of Effect Report, February 19, 2016
14. City of Golden Valley comment letter on Final Determination of Effect Report, February 19, 2016
15. MnHPO letter regarding Final Determination of Effect Report, February 22, 2016
16. FTA letter inviting the Advisory Council on Historic Preservation to participate in the proposed METRO Blue Line Light Rail Transit (BLRT) Extension project Section 106 process, February 29, 2016
17. Advisory Council on Historic Preservation letter declining participation in the proposed BLRT Extension project Section 106 process, March 15, 2016
18. MnDOT Cultural Resources Unit letter re-evaluating the boundaries for the Floyd B. Olson Memorial Statue to MnHPO, March 10, 2016
19. MnHPO letter concurring on re-evaluation of boundaries for the Floyd B. Olson Memorial Statue, March 28, 2016



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## Minnesota Department of Transportation

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### Office of Environmental Stewardship

Mail Stop 620  
395 John Ireland Boulevard  
St. Paul, MN 55155

Office Tel: (651) 366-4292

Fax: (651) 366-3603

11 March 2014

Ms. Sarah Beimers  
Minnesota State Historic Preservation Office  
345 Kellogg Boulevard West  
St. Paul, MN 55102

RE: Bottineau Transitway Project, Hennepin County, MN (SHPO #2011-3773)

Dear Ms. Beimers:

We last wrote your office regarding the above referenced project on 19 September 2013, regarding inventory revisions and the assessment of potential project effects. We appreciate the response of 8 October 2013.

We are writing now to provide some additional inventory information on individual features located within a portion of the NRHP-eligible Grand Rounds Historic District. This information may be helpful during our upcoming consultation on resolution of adverse effects and a Section 106 Agreement.

These features – two railroads and five bridges - are located in Theodore Wirth Park, a contributing element of the Grand Rounds. None of the features were identified in SHPO's recent Grand Rounds NRHP evaluation, which served as the basis for the determination of eligibility for the district. The architecture history survey of the Bottineau project did not address individual features within the previously-evaluated district.

To aid in continuing consultation on the project, we have compiled information and phase I inventory forms for these features.

The phase I forms for two of the features were forwarded to you with our letter of 19 September 2013. These features are:

- Osseo Branch Line, StPM&M/GN Railroad (HE-RRD-002)
- Bridge, StPM&M/GN over Bassett Creek (HE-MPC-5286)

Neither of these two features was identified as contributing to the Grand Rounds District. You have concurred with determinations that the Osseo Branch Line meets National Register criteria, and that the line's bridge over Bassett Creek is non-contributing to the eligible rail line.

Phase I forms for the other five features are enclosed:

- Electric Short Line Railway “Luce Line” (Minneapolis segment, HE-MPC-9800; Golden Valley segment, HE-GVC-055)
- Electric Short Line Bridge over Bassett Creek (HE-MPC-5285)
- Electric Short Line Trestle over Bassett Creek (HE-GVC- 376)
- TH 55 Bridge/Culvert over East Channel Bassett Creek (HE-MPC-5288)
- Bridge No. 27237 (TH 55) over Bassett Creek (HE-MPC-5287)

None of the above five features were identified as contributing to the Grand Rounds District. Based on the information and recommendations on the phase I forms, we have determined that none of them are individually eligible to the NRHP, and that no additional evaluation is needed.

Please submit any comments on the above within 30 days of this letter. If you have any questions or concerns, please contact me at 651-366-4292.

Sincerely,



Dennis Gimmestad  
MnDOT Cultural Resources Unit

cc (via email):

Bill Wheeler, Federal Transit Administration  
Maya Sarna, Federal Transit Administration  
Joe Gladke, Hennepin County  
Brent Rusco, Hennepin County  
Kathryn O’Brien, Metropolitan Council  
Jack Byers, City of Minneapolis  
Jim Voll, City of Minneapolis  
Joseph Hogeboom, City of Golden Valley  
Marcia Glick, City of Robbinsdale  
Patrick Peters, City of Crystal  
Todd Larson, City of Brooklyn Park  
Peter Vickerman, City of Maple Grove  
Jennifer Ringold, Minneapolis Park and Recreation Board  
Jeanne Witzig, Kimley-Horn  
Jenny Bring, The 106 Group  
Beth Bartz, SRF

## STATE HISTORIC PRESERVATION OFFICE

April 11, 2014

Mr. Dennis Gimmestad  
Cultural Resources Unit  
MN Dept. of Transportation  
395 John Ireland Boulevard, Mail Stop 620  
St. Paul, MN 55155-1899

RE: Bottineau Transitway Project  
Hennepin County  
SHPO Number: 2011-3773

Dear Mr. Gimmestad:

Thank you for continuing consultation on this project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

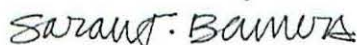
Thank you for submitting the Phase I inventory forms for the five (5) features located within, but not listed as contributing elements to, the Grand Rounds Historic District:

- Electric Short Line Railway "Luce Line" (Minneapolis Segment: HE-MPC-9800; Golden Valley Segment: HE-GVC-055)
- Electric Short Line Bridge (HE-MPC-5285)
- Electric Short Line Trestle (HE-GVC-376)
- T.H. 55 Bridge/Culvert (HE-MPC-5288)
- Bridge No. 27237 (HE-MPC-5287)

We concur with your determination that none of these five (5) properties are individually eligible for listing in the NRHP.

We look forward to continuing consultation on the Bottineau Transitway Project. Please feel free to contact me if you have any questions or concerns regarding our comments. I can be reached at 651-259-3456 or by e-mail at sarah.beimers@mnhs.org.

Sincerely,



Sarah J. Beimers  
Manager, Government Programs & Compliance



DEPARTMENT OF THE ARMY  
ST. PAUL DISTRICT, CORPS OF ENGINEERS  
180 FIFTH STREET EAST, SUITE 700  
ST. PAUL MINNESOTA 55101-1678

MAR 30 2015

REPLY TO  
ATTENTION OF

Operations - Regulatory (2012-01051-MMJ)

Ms. Marisol R. Simon  
Regional Administrator  
Federal Transit Administration  
200 West Adams Street  
Chicago, Illinois 60606

Dear Ms. Simon:

The U.S. Army Corps of Engineers, St Paul District, Regulatory Branch has received your letter dated February 05, 2015, concerning the designation of lead Federal agency pursuant to 36 CFR § 800.2. for the Bottineau Transitway Project (SHPO #2011-3773). We agree that it is appropriate for the U.S. Department of Transportation, Federal Transit Administration to act as the lead Federal agency for the purposes of fulfilling our collective responsibilities under section 106 of the National Historic Preservation Act.

We appreciate your efforts to consider potential effects to historic properties and the expertise of the MnDot Cultural Resource Unit in that regard. We would still like to remain a consulting party during the review of this project and would only become more involved in historic property issues if for example measures to avoid effects to a historic property involved regulated impacts to waters of the United States.

If you have any questions concerning our role in the section 106 review please call Brad Johnson at (651) 290-5250. If you have questions about our regulatory program, please call Melissa Jenny at (651) 290-5363.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamara E. Cameron".

Tamara E. Cameron  
Chief, Regulatory Branch

Copy furnished:  
Bill Wheeler, FTA  
Maya Sarna, FTA  
Sarah Beimers, Mn SHPO  
Greg Mathis, MnDOT CRU  
Kathryn O'Brien, BPO



**Minnesota Department of Transportation**

**Office of Environmental Services**

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395 John Ireland Boulevard

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greg.mathis@state.mn.us

July 10, 2015

Sarah Beimers  
State Historic Preservation Office  
Minnesota Historical Society  
345 Kellogg Blvd. W.  
St. Paul, MN 55102

RE: Blue Line Extension Project (formerly Bottineau Light Rail Transit), Hennepin County, Minnesota;  
Consultation Meetings and Potential Effects, SHPO #2011-3773

Dear Ms. Beimers,

We are writing to continue consultation on the Blue Line Extension Project (Project), formerly known as the Bottineau Light Rail Transit Project. This submittal includes updated information on Project effects on historic properties that will serve as the basis for assessing effects and, ultimately, the development of a Section 106 Memorandum of Agreement for the Project. Following standard practice, all Section 106 consulting parties for the Project are copied on this letter.

Thank you for your participation at the Section 106 consultation kick off meeting that was held on June 5, 2015. The next meetings with your office and Section 106 consulting parties are scheduled for July 10, at 12:30 p.m. and July 16, at 2:30 p.m. Both meetings will be held at:

Blue Line Project Office  
5514 West Broadway Ave., Suite 200  
Crystal, MN

The primary purpose of these meetings is to review potential Project effects on historic properties in the Area of Potential Effect (APE) and to reach agreement on whether different effects have the potential to result an adverse effect. As part of this discussion, we look forward to discussing analysis that may be required to reach a final determination of effect. These discussions will allow us to identify Project effects that have no potential to result in an adverse effect, thereby permitting future consultations to focus on those that need additional analysis to determine effect and those that have the potential to result in an adverse effect.

The July 10 meeting will focus on historic properties located in the cities of Brooklyn Park, Crystal and Robbinsdale, including:

- Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)
- Minneapolis & Pacific Railway / Soo Line Railway Historic District (HE-CRC-199)
- Jones-Osterhus Barn (HE-RBC-264)
- West Broadway Avenue Residential Historic District (HE-RBC-158)
- Hennepin County Library, Robbinsdale Branch (HE-RBC-024)
- Village of Robbinsdale Waterworks (HE-RBC-286)
- Sacred Heart Catholic Church (HE-RBC-1462)

The July 16 will cover historic properties located in Minneapolis and Golden Valley, including:

- St. Paul Minneapolis & Manitoba Railway Historic District (XX-RRD-010)

- Minneapolis Warehouse Historic District (HE-MPC-0441)
- Northwestern Knitting Company Factory (HE-MPC-8125)
- Sumner Branch Library (HE-MPC-8081)
- Wayman A.M.E. Church (HE-MPC-8290)
- Labor Lyceum (HE-MPC-7553)
- Floyd B. Olson Memorial Statue (HE-MPC-9013)
- Homewood Historic District (HE-MPC-12101)
- Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)
- Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001)
- Bridge No. L9327 (Theodore Wirth Parkway) (HE-GVC-0050)

Please find attached the following materials for your review:

- Overview maps showing project elements, the APE, and the locations of historic properties
- One-page summaries of each historic property within the APE. These summaries describe the NRHP eligibility of the historic property, project elements in the vicinity of the property, and potential effects on the property. Included with the summaries is a one-page key that describes National Criteria, aspects of integrity, and the criteria of adverse effect (36 CFR 800.5).

We request your comment on potential effects identified for each historic property, as well as those effects that have the potential to result in no effect or no adverse effect, and those requiring additional analysis before a determination of effect can be made, including those with the potential to result in an adverse effect. We also welcome all consulting parties to review the attached materials, participate in both upcoming consultation meetings, and submit comments on potential effects. Please submit comments within 30 days of this letter.

If you have any questions or concerns, please contact me at (651) 366-4292.

Sincerely,



Greg Mathis  
MnDOT Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration  
 Maya Sarna, Federal Transit Administration  
 Chris Bertch, Federal Transit Administration  
 Melissa Jenny, United States Army Corps of Engineers  
 Brad Johnson, United States Army Corps of Engineers  
 Kathryn O'Brien, Metropolitan Council  
 David Jaeger, Hennepin County Public Works  
 Brent Rusco, Hennepin County Housing, Community Works and Transit  
 Todd Larson, City of Brooklyn Park  
 John Sutter, City of Crystal  
 Emily Goellner, City of Golden Valley  
 John Byers, City of Minneapolis  
 Jim Voll, City of Minneapolis  
 Marcia Glick, City of Robbinsdale  
 Adam Arvidson, Minneapolis Park and Recreation Board





# City of Robbinsdale

4100 Lakeview Avenue North • Robbinsdale • Minnesota • 55422-2280  
Phone (763)531-1258 • Fax (763)531-1291  
Website [www.robbinsdalemn.com](http://www.robbinsdalemn.com)

August 7, 2015

Greg Mathis  
MnDOT Cultural Resources Unit  
Offices of Environmental Services  
Mail Stop 620  
395 John Ireland Boulevard  
St Paul, MN 55102

RE: Blue Line Extension Project, Robbinsdale, MN  
SHPO#2011-3773

Dear Mr. Mathis,

I have reviewed the Section 106 documentation presented at the July 10, 2015 meeting for identified historic properties located in Robbinsdale:

- Jones-Osterhus Barn (HE-RBC-264)
- West Broadway Avenue Residential Historic District (HE-RBC-158)
- Hennepin County Library, Robbinsdale Branch (HE-RBC-024)
- Village of Robbinsdale Waterworks (HE-RBC-286)
- Sacred Heart Catholic Church (HE-RBC-1462)
- Osseo Branch Line, ... (HE-RRD-002, et.al.)

Our review is as follows:

Jones-Osterhus Barn report for July 2015 - no comments to add.

West Broadway Avenue report for July 2015 – Potential effects should address the full width use of the right-of-way resulting in elevated rail being closer to the homes.

Hennepin County Library report for July 2015 – Potential effects should consider the expected cul-de-sac of Railroad Avenue and impact on access. The building use in the 2<sup>nd</sup> indirect effects bullet should indicate that the building is currently used as a gallery and museum, not just a museum.

Robbinsdale Waterworks report for July 2015 – First indirect effects bullet point should identify that the BLRT will be located west, not east of the property. Second indirect effects bullet point should either identify the crossing at 41<sup>st</sup>/Noble instead of 42<sup>nd</sup> or both of the crossings as the site is located between the two and signals at both would be heard from the site.

Greg Mathis  
August 7, 2015  
Page 2

Sacred Heart Church report for July 2015 – the building corner stone indicates that the building was constructed in 1958; the report states 1950. First indirect effects bullet point should identify that the BLRT will be located west, not east of the property. Second indirect effects bullet point should identify the crossing at 41<sup>st</sup>/Noble, not 42<sup>nd</sup>.

Osseo Branch Line railroad – no comments to add.

You can reach me at 763-531-1258 during business hours or email [mglick@ci.robbinsdale.mn.us](mailto:mglick@ci.robbinsdale.mn.us)

Sincerely,

A handwritten signature in blue ink that reads "Marcia Glick". The signature is written in a cursive style.

Marcia Glick  
Robbinsdale City Manager



7800 Golden Valley Road  
Golden Valley, MN 55427

August 10, 2015

Greg Mathis  
Office of Environmental Services, Cultural Resources Unit  
Minnesota Department of Transportation  
395 John Ireland Blvd, Mail Stop 620  
St. Paul, MN 55416  
(651) 366-4292  
[greg.mathis@state.mn.us](mailto:greg.mathis@state.mn.us)

Mr. Mathis,

City Staff has received and reviewed the information provided with your letter addressed to Ms. Beimers on July 10, 2015. As a consulting party, City of Golden Valley Staff has prepared the following comments regarding the review of potential effects that the Blue Line Extension Project may have on historic properties in the Area of Potential Effect. This feedback is focused on the Theodore Wirth Segment of the Grand Rounds Historic District.

Staff agrees with the assessment of direct and indirect effects identified in the summary documents provided at the consulting parties' meeting on July 16, 2015. In addition to this information, Staff looks forward to evaluating the results of the Cultural Landscape Study. Staff is particularly interested in the effect that the vertical circulation structures may have on the setting and feeling of the Theodore Wirth Segment of the Grand Rounds Historic District. Staff also looks forward to evaluating the results of the additional noise analysis that is being completed for the Final Environmental Impact Statement. Both of these studies should inform the determination of effect. Staff has begun brainstorming ways to mitigate what staff feels to be adverse effects to the property.

While it is still early in the this process, staff is eager to assist with formulating ways to avoid, minimize, and mitigate noise and visual effects that the Blue Line Extension may have in this area. For example, the vertical circulation structures could be constructed with wood-based materials that complement the natural setting rather than the plastic and metal materials more commonly used for construction of such structures in urban settings.

In regards to the design of the park, it is predicted that there will be alterations to Bassett Creek as well as to a number of pedestrian trails within this historic district due to the construction of the Blue Line Extension. Again, staff is eager to assist in brainstorming ways to avoid, minimize, and mitigate these effects caused by the construction of the Blue Line Extension. Many of the informal trails that travel east-west through the Park will be closed due to this project. To mitigate the lack of east-west connections, the project could replace lost trails with new east-west pedestrian and bicycle connections at Golden Valley Road, Theodore Wirth Parkway, Plymouth Avenue, or other areas within the historic district.

In conclusion, City of Golden Valley Staff finds that the integrity of the Theodore Wirth Segment of Grand Rounds Historic District would be diminished with the construction of the Blue Line Extension. Staff predicts that further analysis by your team will conclude that there are adverse effects to the integrity of the Theodore Wirth Segment of the Grand Rounds Historic District, most notably to the design, setting, and feeling of the area. These effects will occur not only during construction of the Blue Line Extension, but will be a permanent change to the integrity of this historic property that is so highly regarded and valued by the community. While freight rail has been present within this historic district for a very long period of time, passenger rail has never been present. The introduction of passenger rail and stations will certainly change the setting and feeling of this historic property.

Please let me know if you have any clarifying questions regarding this feedback. We look forward to continued consultation on this subject.

Sincerely,

A handwritten signature in black ink that reads "Emily Goellner". The signature is written in a cursive, flowing style.

Emily Goellner  
Associate Planner/Grant Writer

cc: Sara Beimers, State Historic Preservation Office, Minnesota Historical Society  
Kathryn O'Brien, Metropolitan Council  
Caroline Miller, Metropolitan Council  
Adam Arvidson, Minneapolis Park and Recreation Board  
Jack Byers, City of Minneapolis  
Jim Voll, City of Minneapolis  
Brent Rusco, Hennepin County



August 10, 2015

Greg Mathis  
Minnesota Department of Transportation- Cultural Resources Unit  
Office of Environmental Services  
Mail Stop 620  
395 John Ireland Boulevard  
St. Paul, MN 55155

**RE: Blue Line Extension Project (formerly Bottineau Light Rail Transit), Hennepin County; Minnesota; Consultation Meetings and Potential Effects (SHPO#2011-3773)**

Dear Mr. Mathis,

Thank you for providing the materials included in your July 10, 2015 letter, supporting materials, and consultation meeting on July 16, 2015. The City of Minneapolis CPED-Long Range Planning Division submits the following comments on behalf the Minneapolis HPC, a consulting party to the Section 106 review.

Your letter dated July 15, 2015 requested comments on no effect or adverse effects, but in the consultation meetings this was revised to a request to comment if direct or indirect effects were correctly identified, and not to comment on adverse effects. This letter is limited to indirect and direct effects and we will comment on adverse effects, if any, at the appropriate time.

CPED-Long Range Planning comments on the preliminary determinations of effect are organized in a manner consistent with the organization presented in your July 10, 2015 correspondence, the consultation meeting, overview maps, and the one page summaries of each historic property.

CPED-Long Range Planning concurs with the determination that potential effects on the Minneapolis Warehouse Historic District (HE-MPC-0441) have already been accounted for as part of the 106 review of the Target Field Station.

CPED-Long Range Planning agrees with your identification of no direct effect or direct effects for the following properties:

- St. Paul Minneapolis & Manitoba Railway Historic District (XX-RRD-010)
- Northwestern Knitting Company Factory (HE-MPC-8125)
- Sumner Branch Library (HE-MPC-8081)
- Wayman A.M.E. Church (HE-MPC-8290)
- Labor Lyceum (HE-MPC-7553)
- Floyd B. Olson Memorial Statue (HE-MPC-9013)
- Homewood Historic District (HE-MPC-12101)
- Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)
- Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001)

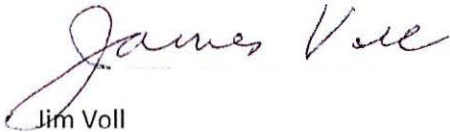
CPED-Long Range Planning agrees with the identification of indirect effects for the following properties:

- St. Paul Minneapolis & Manitoba Railway Historic District (XX-RRD-010)
- Northwestern Knitting Company Factory (HE-MPC-8125)
- Sumner Branch Library (HE-MPC-8081)
- Wayman A.M.E. Church (HE-MPC-8290)
- Labor Lyceum (HE-MPC-7553)
- Floyd B. Olson Memorial Statue (HE-MPC-9013)
- Homewood Historic District (HE-MPC-12101)
- Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)
- Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001)

However, for Sumner Library, Wayman A.M.E. Church, Labor Lyceum, and the Floyd B, Olson Memorial Statue we request clarification if construction and operation vibration were determined to be an indirect effect and how that determination is made, in order for us to comment on that issue. Additional clarification will help us with our evaluation.

We encourage all parties to continue their efforts to protect the properties from any damage from vibration during construction and/or operation, especially those structures along Olson Memorial Highway in close proximity to the line; Sumner Library, Wayman A.M.E. Church, Labor Lyceum, and the Floyd B, Olson Memorial Statue.

Sincerely,



Jim Voll

Principal City Planner, AICP, LEED AP  
City of Minneapolis- CPED-Long Range Planning  
105 5<sup>th</sup> Avenue South, Suite 200  
Minneapolis, MN 55415  
Phone: (612) 673-3887  
[james.voll@minneapolismn.gov](mailto:james.voll@minneapolismn.gov)

cc: Sarah Beimers. MN SHPO (via email)  
Jack Byers, CPED-Long Range Planning (via email)

STATE HISTORIC PRESERVATION OFFICE

August 10, 2015

Greg Mathis  
Cultural Resources Unit  
MN Dept. of Transportation  
395 John Ireland Boulevard, Mail Stop 620  
St. Paul, MN 55155-1899

RE: Blue Line Extension Project (formerly Bottineau Light Rail Transit)  
Hennepin County  
SHPO Number: 2011-3773

Dear Mr. Mathis:

Thank you for continuing consultation on this project. Information received in our office on 10 July 2015 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

We have completed our review of your correspondence letter dated July 10, 2015 and the accompanying documents for continuing our Section 106 review of the Blue Line Extension Project (Project) which included:

- Project overview maps; and
- One-page summaries (dated July 2015) for historic properties within the Project's area of potential effect (APE) which included historic property overviews as well as discussion of potential effects.

We appreciated the opportunity to participate in the two (2) Project consultation meetings on July 10<sup>th</sup> and July 16<sup>th</sup> during which your agency and the project sponsor provided review of these materials and an opportunity for discussion among consulting parties. Based upon our current understanding of the proposed Project, comments and recommendations regarding your agency's identification of potential effects to historic properties are summarized below, by historic property:

- **St. Paul Minneapolis & Manitoba Railway/Great Northern Railway Historic District (XX-RRD-010), Minneapolis** – Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Minneapolis Warehouse Historic District (HE-MPC-0441), Minneapolis** – We agree with your agency's determination that any potential effects caused by the addition of the Project at the Target Field Station (formerly Interchange Project) were reviewed and taken into consideration as part of the Section 106 review for the Interchange Project which resulted in a "no adverse effect" determination.
- **Northwestern Knitting Company Factory (HE-MPC-8125), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Sumner Branch Library (HE-MPC-8081), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Wayman African Methodist Episcopal Church (HE-MPC-8290), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Labor Lyceum (HE-MPC-7553), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate. In addition, due to the fact that this property's primary façade and entrance faces south towards Olson Memorial Highway, we recommend that your agency also consider potential



effects to this historic property which may be caused by redesign of the adjacent sidewalk and the elimination of pedestrian and/or street crossings from the south side of Olson Memorial Highway.

- **Floyd B. Olson Memorial Statue (HE-MPC-9013), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Homewood Residential Historic District (HE-MPC-12101), Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Hennepin County Library, Robbinsdale Branch (HE-RBC-024), Robbinsdale** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate. We also recommend that your agency analyze any potential effects caused by change in access – pedestrian, automobile, or other form of transportation – to this historic property that may be caused by the Project's construction.
- **Jones-Osterhus Barn (HE-RBC-264), Robbinsdale** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate. We also recommend that your agency analyze any potential effects caused by change in access – pedestrian, automobile, or other form of transportation – to this historic property that may be caused by the Project's construction.
- **Robbinsdale Waterworks (HE-RBC-286), Robbinsdale** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Sacred Heart Catholic Church (HE-RBC-1462), Robbinsdale** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **West Broadway Avenue Residential Historic District (HE-MPC-158), Robbinsdale** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate. We also recommend that your agency analyze any potential effects caused by change in access – pedestrian, automobile, or other form of transportation – to this historic property that may be caused by the Project's construction.
- **Minneapolis & Pacific Railway/Minneapolis, St. Paul & Sault Ste. Marie Railway/Canadian Pacific Railway Historic District (HE-CRC-199), Crystal** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Osseo Branch Line, Minneapolis & Northwestern/St. Pau, Minneapolis & Manitoba/Great Northern Railway Historic District (HE-RRD-002), Brooklyn Park, Crystal, Golden Valley, Robbinsdale, Minneapolis** – In August 2013, our office provided a “no adverse effect” determination to your agency based upon preliminary Project design plans at that time. Since then, your agency has indicated that additional corridor protection infrastructure will be added to the Project's scope and therefore our earlier determination may not be valid. Your agency's proposal for reconsideration for potential direct and indirect effects to this historic property, based upon revised Project plans, is appropriate.
- **Bridge No. L9327 (HE-GVC-0050), Golden Valley** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate.
- **Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001), Golden Valley, Minneapolis** - Your agency's proposal for considering potential direct and indirect effects to this historic property is appropriate. We also recommend that your agency analyze any potential effects caused by change in access – pedestrian, automobile, or other form of transportation – to this historic property that may be caused by the Project's construction.

We look forward to continuing consultation on this project. Please feel free to contact me if you have any questions or concerns regarding our comments. I can be reached at 651-259-3456 or by e-mail at sarah.beimers@mnhs.org.

Sincerely,



Sarah J. Beimers  
Manager, Government Programs & Compliance





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION V  
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Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
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312-353-2789  
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January 20, 2016

Sarah Beimers  
State Historic Preservation Office  
Minnesota Historical Society  
345 Kellogg Blvd. W.  
St. Paul, MN 55102

RE: Blue Line Extension Project (formerly Bottineau Transitway), Hennepin County,  
Minnesota; Final Determination of Effect, SHPO #2011-3773

Dear Ms. Beimers:

The Federal Transit Administration (FTA) is writing to continue the consultation process for the proposed METRO Blue Line Extension Light Rail Transit Project (proposed Project), formerly known as Bottineau Transitway. FTA would also like to thank the Minnesota State Historic Preservation Office (MnSHPO) for participating in the consultation meetings held on July 10<sup>th</sup> and 16<sup>th</sup>, and for the comments provided in response to the consultation materials provided on August 10, 2015 and October 29, 2015. All Section 106 consulting parties for the proposed Project are copied on this letter.

This letter transmits our final determination of effect for the proposed Project. We want to thank MnSHPO and all consulting parties for their participation in the consultation process that helped us reach this milestone for the proposed Project.

### **Consultation Overview**

The Metropolitan Council (Council) is seeking federal funding under the Capital Investment Grant program from the FTA; therefore, the proposed Project must comply with Section 306108 of the National Historic Preservation Act of 1966 (NHPA), as amended (54 United States Code [U.S.C.] § 306108) (hereinafter referred to as Section 106) and its implementing regulations, 36 Code of Federal Regulations (CFR) 800 et. seq. In accordance with 36 CFR 800.2(a)(2), the United States Army Corps of Engineers (USACE) has recognized FTA as the lead Federal agency responsible for fulfilling their collective obligations under Section 106. The Minnesota Department of Transportation Cultural Resources Unit (MnDOT CRU) has aided FTA in the Section 106 process for the proposed Project, per 36 CFR 800.2(a)(3).

In February 2011, pursuant to 36 CFR 800.3, MnDOT CRU, on behalf of FTA, initiated consultation with MnSHPO, local governments and other parties with a demonstrated interest in historic properties that may be affected by the proposed Project. In January 2012, FTA initiated consultation with the affected Indian tribes in the region. No Indian tribes or Tribal Historic Preservation Offices requested to participate in the consultation.

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As part of its efforts to meet the requirements of Section 106, MnDOT CRU held three (3) consultation meetings with MnSHPO and other consulting parties. The consulting parties for this proposed Project include: MnSHPO; the USACE; Hennepin County; the cities of Brooklyn Park, Crystal, Golden Valley, Minneapolis and Robbinsdale; the Minneapolis Heritage Preservation Commission; and the Minneapolis Park and Recreation Board.

In accordance with 36 CFR 800.4, and through the Section 106 consultation process, FTA has identified historic properties that could be potentially affected by the proposed Project. An APE was defined in September 2011, with MnSHPO concurrence. Between 2011 and 2012, archaeological and architecture/history surveys were conducted for the properties within the proposed Project's APE to identify and evaluate historic properties and determine their eligibility for the National Register of Historic Places (NRHP). As a result of these surveys, a total of 17 NRHP-listed and -eligible properties were identified; MnSHPO has concurred with these determinations.

**Effects Findings**

Utilizing conceptual engineering (approximately 15 percent design) plans, and in accordance with 36 CFR 800.5(a), FTA has made a finding of effect for each property within the proposed Project's APE. These effects assessments and the finding for each historic property are fully described in the attached report entitled *METRO Blue Line Extension Light Rail Transit Project Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties*. This report summarizes the identification process for historic properties that could be potentially affected by the proposed Project within the APE, details the Section 106 consultation process completed to date to consider effects on these properties, discusses the direct and indirect effects on the properties, assesses the impacts of the effects, and provides a final finding for each property. Table 1 provides a summary of the final effect determination for each property. FTA has found that the proposed Project will have:

- No Adverse Effect on six (6) historic properties;
- No Adverse Effect on five (5) historic properties with the implementation of measures that FTA will stipulate in an MOA; and
- An Adverse Effect on six (6) historic properties.

**Table 1: Finding of Effects on Historic Properties Summary**

SHPO Inv. No.	Property Name	Effect Finding
HE-MPC-0441	Minneapolis Warehouse Historic District	No Adverse Effect
XX-RRD-010	St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District	No Adverse Effect
HE-MPC-8125	Northwestern Knitting Company Factory	No Adverse Effect
HE-MPC-8081	Sumner Branch Library	No Adverse Effect
HE-MPC-8290	Wayman A.M.E. Church	Adverse Effect
HE-MPC-7553	Labor Lyceum	No Adverse Effect
HE-MPC-9013	Floyd B. Olson Memorial Statue	Adverse Effect

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SHPO Inv. No.	Property Name	Effect Finding
HE-RRD-002, HE-MPC-16389, HE-RBC-0304, HE-CRC-0238, HE-BPC-0084	Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District	Adverse Effect
XX-PRK-0001	Grand Rounds Historic District, Theodore Wirth Segment	Adverse Effect
HE-MPC-12101	Homewood Residential Historic District	Adverse Effect
HE-GVC-0050	Bridge No. L9327	No Adverse Effect
HE-RBC-1462	Sacred Heart Catholic Church	No Adverse Effect
HE-RBC-286	Robbinsdale Waterworks	No Adverse Effect
HE-RBC-024	Hennepin County Library, Robbinsdale Branch	No Adverse Effect
HE-RBC-158	West Broadway Avenue Residential Historic District	Adverse Effect
HE-RBC-264	Jones-Osterhus Barn	No Adverse Effect
HE-CRC-199	Minneapolis & Pacific Railway / Soo Line Railway Historic District	No Adverse Effect

Based on effects findings documented in the attached assessment of effects report and summarized in Table 1 above, **FTA has determined that the proposed Project will have an Adverse Effect on historic properties.**

The following is a brief summary of the adverse effects on six (6) historic properties identified above and our action to resolve the adverse effects:

- Wayman African Methodist Episcopal Church:** Station area planning studies indicate that the proposed Project will likely catalyze redevelopment on the property itself and/or within its vicinity. More specifically, the station area planning study for the Van White Boulevard Station identifies the church as part of a group of properties proposed to be rezoned to allow for increased density (five or more stories), mixed-use development in order to create a planned neighborhood commercial node around the station. As a result, development pressure created in part by the construction and operation of the proposed Project may lead to changes in the setting of the church and potential alteration or demolition of this property. While new development in the general area would not alter characteristics qualifying the property for inclusion in the NRHP, redevelopment of the property itself could result in alterations that would likely diminish its historic integrity, or demolition which would destroy the historic property. As redevelopment of this historic property is a reasonably foreseeable cumulative effect of the proposed Project, a finding has been made that there will be an Adverse Effect on the Wayman A.M.E. Church.
- Floyd B. Olson Memorial Statue:** The proposed Project will take over and utilize a portion of the historic property along its northern boundary. More specifically, as a result of the proposed Project's infringement onto the NRHP-eligible property, a portion of the statue's formal plaza will be destroyed and incorporated into a street and sidewalk. This will result in the destruction of portions of the designed landscape in which the statue is

situated, and of which the statue is the focal point. Elements that will be partially destroyed include the formal yard in front of the statue, which is an important landscape divider within the site and the statue's setting, as well as the formal walk leading to the statue, which is the primary circulation network within the historic property. These direct physical changes to the designed landscape will also alter important spatial relationships and result in changes to the way the statue is experienced and perceived within both its immediate and larger settings. As a result of these changes, the proposed Project will directly diminish the Floyd B. Olson Memorial Statue property's integrity of design, setting, and feeling. The introduction of Penn Station directly in front of the historic property will also disrupt views and the visual connection between the statue and TH 55, which is an important historic characteristic, and will further diminish the historic property's integrity of setting, feeling, and association. In addition, station area planning studies indicate that the proposed Project will likely catalyze redevelopment on and in the vicinity of this historic property due to its proximity to Penn Station. Specifically, the station area planning study for Penn Station identifies the NRHP-eligible historic property for redevelopment to increase density around the station and proposes to incorporate the statue itself into the renovations. The plan also identifies the redevelopment of adjacent properties. Redevelopment of the historic property and its setting, and incorporation of the statue into the redevelopment would destroy the immediate setting of the statue and severely alter, or sever its critical visual connection with TH 55, thereby further diminishing the historic property's integrity of location, setting, feeling, and association. As the proposed Project will cause both direct and indirect adverse effects on the Floyd B. Olson Memorial Statue, a finding has been made that there will be an Adverse Effect on this historic property.

- **Grand Rounds Historic District, Theodore Wirth Segment:** The proposed Project will permanently acquire about two acres and temporarily use during construction a few additional acres of Theodore Wirth Regional Park while making numerous physical alterations within this element of the Grand Rounds Historic District, Theodore Wirth Segment. Direct effects will physically alter much of the eastern edge of Theodore Wirth Regional Park, as well as a portion of its northern edge where Wirth Parkway, another contributing element, enters the park. In addition, two historic entry points to the Theodore Wirth Segment are being demolished and reconstructed, or substantially altered from natural to developed spaces. This work will not only alter the cultural landscape of the Theodore Wirth Segment of the Grand Rounds Historic District, it will also introduce new, contemporary elements to these portions of the historic district. New visual elements will be in the form of formal, engineered structures such as retaining walls, the LRT guideway and overhead power system, stations, vertical circulation buildings, a parking lot, and other elements to the otherwise naturalistic setting of the park's landscape. Illumination of the stations and vertical circulation towers will also change the visual character of the otherwise dark natural areas within the district at night. In addition, the introduction of Project elements will alter key viewsheds within Theodore Wirth Regional Park, including the most prominent viewshed within the park, which is that from one of the character defining features, the Theodore Wirth Chalet. Collectively the direct physical effects to the Theodore Wirth Segment of the Grand Rounds Historic District, and related/resultant indirect visual effects, will alter historic characteristics that qualify

the district for the NRHP. The alterations to the district will diminish the integrity, design, setting, materials, workmanship, feeling, and association of the Theodore Wirth Segment of the Grand Rounds Historic District. As the proposed Project will cause both direct and indirect adverse effects on the Theodore Wirth Segment of the Grand Rounds Historic District, a finding has been made that there will be an Adverse Effect on this historic district.

- **Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District:** The existing, historic track and roadbed will be removed as part of the proposed Project, with the freight rail alignment being subsequently relocated and two new LRT tracks constructed within the historic district. Substantial amounts of additional Project infrastructure will also be constructed in the district; examples of these elements include the overhead power system, bridges, retaining walls, vertical circulation buildings, stations and fencing, and a variety of corridor protection treatments. In addition, an existing high-voltage transmission line extending along a portion of the district will be relocated within the district and constructed with a new design. The collective relocation of the freight tracks, loss of historic fabric, and introduction of Project infrastructure within the district will alter the perception of the corridor as a historic, isolated freight rail branch into that of a dense, multi-purpose combined freight and transit corridor and will add passenger rail stations to a stretch of rail corridor that has never before had them. Given this, the proposed Project will alter characteristics qualifying the Osseo Branch for inclusion in the NRHP in a manner that will diminish its integrity of design, materials, setting, workmanship, feeling, and association. As the Project will cause direct adverse effects on the Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District, a finding has been made that there will be an Adverse Effect on this historic district.
- **Homewood Residential Historic District:** Noise analysis completed for the proposed Project indicates that without mitigation, LRT operations would cause a moderate noise impact on three residences at the southwestern corner of the historic district. Given its status as a residential historic district, these auditory effects will diminish the district's integrity of setting and feeling. As the proposed Project will cause adverse auditory effects on the Homewood Residential Historic District, a finding has been made that there will be an Adverse Effect on this historic district.
- **West Broadway Avenue Residential Historic District:** The proposed Project alignment will be located directly adjacent to the western boundary of the district on an elevated roadbed and approach structure that leads to the Project's bridge over Trunk Highway 100. The visual presence of the proposed Project and its associated infrastructure will sever the district's visual connection across the existing BNSF Railway freight track with areas to the west. Additionally, proposed Project infrastructure, including tall retaining walls to support the elevated guideway and the overhead power system will introduce new, incompatible, out-of-scale elements to the setting of the district. Collectively, this will diminish the integrity of setting and feeling of the historic district. In addition, a noise analysis indicates that without mitigation, the proposed Project would cause moderate and severe auditory impacts on some residences in the historic district, specifically from LRV horns at nearby grade crossings. Given its status as a residential district, these auditory

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effects will further diminish the district's integrity of setting, feeling and association. As the proposed Project will cause adverse visual and auditory effects on the West Broadway Avenue Residential Historic District, a finding has been made that there will be an Adverse Effect on this historic district.

**Next Steps: Resolution of Adverse Effects**

In accordance with 36 CFR 800.6, FTA will notify the ACHP of the proposed Project's adverse effect on historic properties and invite the ACHP to participate in the Section 106 process. In addition, FTA looks forward to consulting with MnSHPO and other consulting parties to seek ways to resolve the adverse effects on the six (6) historic properties described above, and to develop a MOA to document the measures FTA will implement to avoid, minimize and mitigate adverse effects on historic properties. As part of this effort, FTA and MnDOT CRU will hold a consultation meeting on February 4, 2016 at 1:30 p.m. to 4:30 p.m. at:

Blue Line Extension Project Office  
5514 West Broadway, Suite 200  
Crystal, MN

The purpose of this meeting is to review the final findings of effect with MnSHPO and consulting parties and to continue consultation to consider avoidance, minimization and mitigation measures for adversely effected properties.

Enclosed for your review are:

- Section 106 assessment of effects report noted above;
- Plan sheets from the approximately 15 percent design engineering plans that were used to assess effects on historic properties;
- Photos of specific viewsheds in their existing condition with corresponding renderings generated by the Project office depicting the viewshed after Project completion
- Existing Plymouth Avenue bridge plans
- Details on Traction Power Substations (TPSS) and the location of TPSS along the Project alignment
- Technical memorandum on noise and vibration impacts caused by the Project
- Technical memorandum on traffic and access impacts caused by the Project
- Station area planning studies concerning Project stations in Minneapolis, Golden Valley, and Robbinsdale
- Meeting notes from the consultation meetings held on July 10 and July 16, 2015.

*In closing, we request that MnSHPO provide its concurrence with FTA's final findings of effect and final determination of effect for the proposed Project in writing within 30 days of receiving this correspondence.*

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If you have any questions, please contact Reggie Arkell at (312) 886-3704, [reginald.arkell@dot.gov](mailto:reginald.arkell@dot.gov) or Maya Sarna at (202) 366-5811, [maya.sarna@dot.gov](mailto:maya.sarna@dot.gov).

Sincerely,



Marisol R. Simón  
Regional Administrator

Enclosures: *Section 106 Assessment of Effects for Historic Properties* (FTA and MnDOT CRU, January 2016)  
*Blue Line LRT Extension, Section 106 Process Design Documents*, Volumes 1-10 (Council and Kimley Horn Associates, November, 2015)  
*Technical Memorandum: BLRT Section 106 Historic Properties – Traffic/Access Impacts* (Blue Line Extension Project Office, November 2015)  
*Technical Memorandum: BLRT Noise and Vibration Effects on Historic and Cultural Resources* (Cross-Spectrum Acoustics, November 2015)  
*METRO Blue Line Extension Phase I: Station Area Planning, Plymouth Avenue and Golden Valley Road Stations* (Hennepin County, June 2015)  
*METRO Blue Line Extension Phase I: Station Area Planning, Van White Boulevard and Penn Avenue Stations* (Hennepin County, June 2015)  
Robbinsdale Station Area Planning, Public Meeting Presentation (Hennepin County, October 21, 2015)  
*METRO Blue Line Extension Section 106 Consultation Meeting 2A* (7/10/2015) meeting notes  
*METRO Blue Line Extension Section 106 Consultation Meeting 2B* (7/16/2015) meeting notes

cc: Bill Wheeler, FTA  
Maya Sarna, FTA  
Melissa Jenny, USACE  
Brad Johnson, USACE  
Greg Mathis, MnDOT CRU  
Kathryn O'Brien, Metropolitan Council  
David Jaeger, Hennepin County Public Works  
Brent Rusco, Hennepin County Housing, Community Works and Transit  
Todd Larson, City of Brooklyn Park  
John Sutter, City of Crystal  
Emily Goellner, City of Golden Valley  
John Byers, City of Minneapolis  
Jim Voll, City of Minneapolis  
Marcia Glick, City of Robbinsdale  
Adam Arvidson, Minneapolis Park and Recreation Board

**From:** [Marcia Glick](#)  
**To:** [Mathis, Gregory \(DOT\)](#)  
**Subject:** RE: Sec 106 notes  
**Date:** Wednesday, February 17, 2016 4:40:08 PM

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The City of Robbinsdale concurs with designations.

We would like to see consideration of the aesthetic impact of the elevated rails on the West Broadway homes. My understanding from the noise study is that no noise walls were proposed in this stretch and that noise would be addressed by quiet zones and wayside devices. Two northerly homes (probably the two furthest north) are shown as having moderate noise impacts with quiet zones. Installing a noise wall on the eastern side of the track could help to block the aesthetic/privacy concerns heard from some of the neighbors. I am surprised that the view to the west isn't already blocked by the height of the freight rails. Will be looking forward to further discussion on how to best mitigate the impacts on these homes.



Caroline Miller,  
Environmental Specialist  
Blue Line Extension Project Office - Metro Transit  
5514 West Broadway Avenue, Suite 200  
Crystal, MN 55428

Re: Section 106 Comments – Osseo Branch of the StPM&M Railroad

February 18, 2016

Dear Ms. Miller,

Thank you for the opportunity to consult on historic properties in the Blue Line Extension corridor. Brooklyn Park has one identified district within our project area – the Osseo Branch, St. Paul, Minneapolis, and Manitoba Railway Historic District. The significance of the district pertains to the agricultural production of the area and transportation of goods, mainly potatoes, to markets in Minneapolis and beyond. This district has been identified as being adversely affected by the proposed Blue Line Extension project. Here are three comments we have related to that finding:

1. To our knowledge, none of the original tracks, ties, structures, or other railroad equipment remain.
2. The historic use of the corridor was related to the growth and development of northern Hennepin County and the proposed modifications to include light rail will also aide in the growth and development of this area.
3. Only a portion of the corridor will be impacted. The portion of the corridor north of 73<sup>rd</sup> Avenue will remain untouched.

It is our position that the impacts are noted, but not of concern. We recommend a mitigation strategy that includes historical interpretive signage be included in the station at 63<sup>rd</sup> Avenue. This signage could include a written description of the significance of the rail corridor on the area, maps, and historical photographs, if any exist.

I can be reached at (763) 493-8069 or [todd.larson@brooklynpark.org](mailto:todd.larson@brooklynpark.org) if you have any questions.

Sincerely,



Todd A. Larson,  
Senior Planner



**Hennepin County**  
Public Works

300 South Sixth Street  
Minneapolis, MN 55415-1842

[www.hennepin.us](http://www.hennepin.us)

Greg Mathis  
Cultural Resources Unit  
Office of Environmental Stewardship  
Minnesota Department of Transportation  
395 John Ireland Boulevard, Mail Stop 620  
St. Paul, MN 55155

RE: Hennepin County Comments to Section 106 Assessment of Effects for BLRT

Dear Greg:

The purpose of this letter is to provide input on the *METRO Blue Line Extension Light Rail Transit Project Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties (January 2016)* document prepared by the MnDOT Cultural Resources Unit (CRU) on behalf of the Federal Transit Administration.

As a BLRT project partner and Section 106 consulting party, Hennepin County appreciates the leadership of the Federal Transit Administration (FTA) throughout the environmental study process on the METRO Blue Line Extension Light Rail Transit (LRT) project including ongoing efforts associated with the development of the Final Environmental Impact Statement (FEIS) and the ongoing Section 106 assessment process. Hennepin County also appreciates the efforts of MnDOT CRU and MnHPO for the engagement of consulting partners in compiling this important above referenced Section 106 assessment documentation. In reviewing the assessment and determination materials, Hennepin County offers the following comments focused on one of the identified historic properties in the corridor determined to have an adverse effect, the Floyd B. Olson Memorial Statue.

It is in the spirit of open dialogue and understanding of this important historic resource that we offer the comments contained in this letter in the hope that it will help inform the best possible project design while respecting the integrity of the resource and accommodating the needs of people living and traveling in the area.

**Hennepin County Section 106 Consulting Party Input**

Hennepin County concurs with the assessment that the Floyd B. Olson Memorial Statue property will experience changes, but has the opinion that a deeper assessment is needed during the upcoming "resolution of adverse effects stage" to determine what, if any, measures are needed to avoid, minimize, or mitigate any adverse effects.

We offer the following input relative to assessment and determination of effects to further explore the assessment included in the January 2016 Section 106 assessment documentation.

1. Page 18 of the documentation refers to seven aspects or qualities that must be considered to determine whether a property retains integrity. The first of the seven states the following; "Location: the place where the historic property was constructed or the place where the historic event occurred." The Floyd B. Olson Statue occupied the median of Olson Memorial Highway and was relocated to its current location along the south side of Olson Memorial Highway in 1984. This fact seems an important- relevant aspect not mentioned in the report.
2. The assessment of physical of impacts to the resource property needs better context and description in order to further understand the determination of effects. A more comprehensive description of existing conditions and conditions after the LRT project is built is needed to inform the assessment as illustrated by the following:

The assessment document (page 38 of the document, rationale section) states that *“Portions of the formal yard in front of the statue, which is an important landscape divider within the site and the statues setting, as well as the formal walk leading to the statue, which is the primary circulation network within the historic property, will be destroyed as a result of the Project’s infringement onto the historic property. . These direct physical changes to the designed landscape will also alter important spatial relationships and result in changes to the way the statue is experienced and perceived within both its immediate and larger settings. As a result of these changes, the proposed project will directly diminish the Floyd B. Olson Memorial Statue properties integrity of design, setting, and feeling.”*

Under existing conditions an east-west sidewalk runs adjacent to the south side of Olson Highway directly adjacent to the back of curb in the resource property. This sidewalk connects with a formal walk leading to the statue. A “formal yard” between the statue and the sidewalk exists including trees and low shrubs adjacent to the formal walk leading to the statue.

With the LRT project, the sidewalk adjacent to the south side of Olson highway would be relocated further south to allow a 10 foot tree lined boulevard between the roadway and the sidewalk. This would remove an approximate 10 foot segment of the formal walk leading to the statue due to the sidewalk relocation.

The 10 foot tree lined boulevard and relocated sidewalk provides several benefits to the overall Olson Memorial Highway environment which also benefits the Floyd B. Olson Statue resource. The 10 foot boulevard provides an opportunity to replace the resource property landscaping impacted by the sidewalk relocation. The 10 foot boulevard also provides an opportunity for snow storage and separation of pedestrians from Olson Highway traffic and associated road spray in rainy conditions. The relocated sidewalk enhances the safety and comfort of pedestrians on the south side of Olson Highway including visitors accessing the statue.

Based on the above, it is Hennepin County’s perspective that the above changes will result in positive effects not captured in the documentation. Specifically, we do not agree with the statement *“...the proposed project will directly diminish the Floyd B. Olson Statue properties integrity of design, setting, and feeling.”*

3. The assessment document (Page 38 of the document in the rationale section) states, *“The introduction of Penn Station directly in front of the historic property will also disrupt views and the visual connection between the statue and TH 55, which is an important historic characteristic of the historic property. This will further diminish the historic properties integrity of setting, feeling and association.”*

Hennepin County’s perspective is that views will be altered in a number of ways and that a more thorough assessment is needed to determine how the various views would be both disrupted and enhanced by the LRT project.

The main view sheds to the Floyd B. Olson are from Olson Memorial Highway including pedestrians from adjacent sidewalks and from vehicles (bicyclists, motorists, transit patrons on buses) traveling along Olson Memorial Highway. People living in residences surrounding the property along Olson Memorial Highway also have views of the statue. Present views from Olson Highway motorists and transit patrons are currently partially obstructed by landscaping (trees). Eastbound Olson Highway travelers have the clearest views of the statue directly adjacent to the roadway. Westbound Olson Highway travelers have a more limited view of the statue looking through existing median trees and across eastbound traffic lanes toward the statue. As westbound motorists approach Penn Avenue their attention is drawn to the Penn Avenue traffic signal which is a practical limitation on the opportunity to view the statue. Pedestrians on the northside of Olson Highway are looking across 6 traffic lanes and a tree lined median toward the statue.

The main view sheds/opportunities with the BLRT project expand to include transit patrons traveling to/from the Penn Avenue station platform along sidewalks, proposed bicycle facilities and while waiting on the station platform for the next light rail train. The station platform will disrupt the view of the statue for westbound motorists and for pedestrians on the north side of Olson Memorial Highway within 300 feet of the Penn Avenue intersection. Many transit riders will be newly exposed to Floyd B. Olson resource viewing opportunities as they pass through the area on LRT. The redesign of Olson Memorial Highway as part of the LRT project is intended to reduce traffic speeds adjacent to the resource, which will increase viewing exposure time for the resource for motorists.

Finally, the existing trees in the median of Olson Highway will be removed to accommodate the LRT guideway, and the design will accommodate trees in the boulevards along the north and south sides of Olson Highway. It is uncertain, at the current level of design, what effects the rearrangement of trees in this area would have on views to the resource. One mitigation strategy might be to maintain and/or enhance the view sheds to the statue through the placement of vertical streetscape elements including trees.

Based on the above, Hennepin County questions whether enough assessment has been done to determine whether, in aggregate, views of the statue will be disrupted or enhanced by the LRT project.

4. The assessment references (page 38 under rationale) station area planning studies and states, *"The redevelopment of the historic property would destroy the immediate setting of the historic property and severely alter, or sever its critical visual connection with TH 55, which is an important aspect of its integrity of association. The redevelopment of the adjacent property would further diminish the visual connection and, as a result, its association with TH 55."*

Hennepin County's perspective is that the relevance of the station area plans presented in the assessment is overstated. While it is agreed that redevelopment ideas from the station area plans in and around the historic property could cause impacts to the historic resource, the purpose of the station area plans are to develop a vision for future station area redevelopment based on stakeholder input, and to create illustrative forms and concept sketches for how this redevelopment could come to fruition. There is process ahead which will determine which of the station area plan recommendations move forward at the discretion of each city, accounting for market forces, funding feasibility, and design development efforts.

We do not believe the redevelopment visions identified in the station area plans need to be assessed in better context relative to the BLRT project. While station area plans provide aspirational visions of future redevelopment with inherent speculation, the BLRT project includes detailed concept layouts and environmental study advancing through project development.

Thank you for the opportunity to provide input on the Section 106 Assessment and determination of effects for the BLRT project. While Hennepin County acknowledges that the adverse assessment findings are final as part of the Section 106 process, we request that a deeper discussion of effects and a thorough consideration of design features be included in the next step of the process (resolution of adverse effects).

Sincerely,



Brent Rusco, PE  
Senior Project Manager  
Hennepin County Community Works  
METRO Blue Line Extension Project Office



February 19, 2016

Greg Mathis  
Minnesota Department of Transportation - Cultural Resources Unit  
Office of Environmental Services  
Mail Stop 620  
395 John Ireland Boulevard  
St. Paul, MN 55155

**RE: Blue Line Extension Project (formerly Bottineau Light Rail Transit), Hennepin County; Minnesota; Final Determination of Effects (SHPO#2011-3773)**

Dear Mr. Mathis,

Thank you for providing the FTA letter dated January 20, 2016, supporting materials, and the consultation meeting on February 4, 2016. The City of Minneapolis CPED-Long Range Planning Division submits the following comments on behalf the Minneapolis HPC, a consulting party to the Section 106 review.

CPED-Long Range Planning comments on the final determinations of effect are organized in a manner consistent with the organization presented in the January 20, 2016 FTA correspondence, the consultation meeting, and the *Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties (January 2016)* report.

CPED-Long Range Planning agrees with the identification of no adverse effect for the following properties:

- Minneapolis Warehouse Historic District (HE-MPC-0441)
- St. Paul Minneapolis & Manitoba Railway Historic District (XX-RRD-010)
- Northwestern Knitting Company Factory (HE-MPC-8125)

CPED-Long Range Planning agrees with the identification of no adverse effect, with implementation of the proposed measures in the MOA, for the following properties:

- Sumner Branch Library (HE-MPC-8081)
- Labor Lyceum (HE-MPC-7553)

CPED-Long Range Planning agrees with the identification of potential adverse effect for the following properties:

- Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)
- Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001)
- Homewood Historic District (HE-MPC-12101)

*Wayman A.M.E. Church:* CPED-Long Range Planning agrees with the identification of potential adverse effects for the Wayman A.M.E. Church (HE-MPC-8290), but does not agree entirely with the reasons provided for the cause of the adverse effect. While we agree that close proximity to an LRT station can cause development pressure on adjacent properties, we do not agree that the draft station area planning calls for an upzoning of the area. The current site has R4 Multi-family Residential and R5 Multi-family

Residential zoning that currently allows four-story buildings and higher with a Conditional Use Permit. The draft small area plan does envision that mixed-use commercial could be allowed, and that buildings taller than five stories could be allowed, but it does not show the Wayman A.M.E. Church as a site to be redeveloped on the Redevelopment Opportunity Map. Further, the plan lists the site as a historic property and calls for development near historic resources "to avoid or sensitively incorporate the existing historic resources." Finally, it should be noted that the Wayman A.M.E Church is listed as a Potential Historic Resource in the *Historic Resources in the Central Core Historic Resources Inventory* done for the City of Minneapolis in 2011. As such, any proposed demolition would trigger a demolition of historic resource applications and review by the Commission. With those things in mind, we will incorporate clarifications to the language in the draft small area plan. Likewise, we will consider a possible listing or designation of the property.

CPED-Long Range Planning does not agree with the identification of adverse effects for the Floyd B. Olson Memorial Statue (HE-MPC-9013):

While we concur that the statue might be eligible for the NRHP because it is a work of the master sculptor Carlo Brioschi, we do not concur that its eligibility is based on its current location. As you are aware, the statue is not now in its original location. Therefore, the current setting is not a defining characteristic of its eligibility as is presumed in in the *Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties* (final effects report). The *Phase I and II Architectural History Survey for the Bottineau Transitway Project, Vol. 1* list the following information:

- The statue was moved from the median of Olson Memorial Highway to its current location in 1984
- It was moved not only south of its current site, but also further east
- The statue, benches, and sidewalks were turned 90 degrees from their original orientation
- The original rectilinear plaza that surrounded the statue has been replaced by a larger circular plaza in the new location.
- The new setting along the side of the road, backed by houses of the adjoining neighborhood, is quite different than the original setting in the highway median

A location along Olson Memorial Highway can be considered an environment compatible with the historic location of the statue, under Criteria Consideration B: Moved Properties, but this criteria does not require that the current site is the *only* location along the highway that would be appropriate. The final effects report and architectural survey do not provide any information, drawing, establishment, or action creating a park, park boundaries, or a specific design for the area around the statue during or since the time when the statue was moved from the median.


With regards to the relationship of the statue to the adjacent sidewalk, the final effects report states that there will be an adverse effect from the incorporation of a portion of the property's formal front yard. First and foremost, we believe that there can be no adverse effect about the relationship of the statue to the sidewalk because the statue is *not* in its original location. More specifically, there will be no adverse effect from this incorporation due to the minimal reduction in the yard in front of the statue. After construction there will still be yard in front of the statue that will only be reduced by approximately two feet. Currently, the public sidewalk along the south side of Olson Memorial Highway increases to double its width along its length in front of the statue. The proposed sidewalk with a tree boulevard, as shown in the Municipal Consent Plans, is in almost exactly the same location as the wide portion of the public sidewalk that is present today. Therefore, there will be no difference in the way one experiences or perceives the statue or the landscape setting from the public sidewalk or any other location.

The final effects report states that there will be an adverse effect from the incorporation of the walk leading to the statue. We believe that there can be no adverse effect about the relationship of the statue to the sidewalk leading to the statue because the statue is *not* in its original location. Currently, the public sidewalk along the south side of Olson Memorial Highway increases to double its width along its length in front of the statue. The proposed public sidewalk with a tree boulevard, as shown in the Municipal Consent Plans, is in almost exactly the same location as the wide portion of the public sidewalk that is present

today. The walkway from the proposed public sidewalk to the statue will have the same orientation toward the statue, but will connect to the public sidewalk two feet closer than it does now. Therefore, there will be no difference in the way one experiences or perceives the statue or change to the circulation pattern from the public sidewalk or within the site.

Keeping a wider perspective here is important. The purpose and need statement of the BLRT project includes the goal "to effectively address long-term regional transit mobility and local accessibility needs." North Minneapolis has a large transit dependent population and many zero-car households that require safe pedestrian-friendly access to LRT stations and the associated connecting bus routes and ABRT stations, which are also located at the intersection of Penn Avenue North and Olson Memorial Highway. The station area planning process undertaken by Hennepin County and the City of Minneapolis identified pedestrian access as one of the resident's most important priorities. Locating the public sidewalk in the area shown on the Municipal Consent plans furthers the above noted project goals, does not have any adverse effect on the area surrounding the statue, and cannot reasonably be considered to have any noticeable difference from the current configuration.

Sincerely,



Jim Voll

Principal City Planner, AICP, LEED AP  
City of Minneapolis- CPED-Long Range Planning  
105 5<sup>th</sup> Avenue South, Suite 200  
Minneapolis, MN 55415  
Phone: (612) 673-3887  
[james.voll@minneapolismn.gov](mailto:james.voll@minneapolismn.gov)

cc: Sarah Beimers, MN SHPO (via email)  
Jack Byers, CPED-Long Range Planning (via email)  
Jenifer Hager, City of Minneapolis Public Works (via email)





7800 Golden Valley Road  
Golden Valley, MN 55427

February 19, 2016

Greg Mathis  
Office of Environmental Services, Cultural Resources Unit  
Minnesota Department of Transportation  
395 John Ireland Blvd, Mail Stop 620  
St. Paul, MN 55416  
[greg.mathis@state.mn.us](mailto:greg.mathis@state.mn.us)

Mr. Mathis,

City Staff has received and reviewed the information provided with your letter addressed to Ms. Beimers on January 20, 2016. As a consulting party, City of Golden Valley Staff has prepared the following comments regarding the FTA's finding of effect that the Blue Line Extension Project will have on historic properties in the Area of Potential Effect.

Staff agrees with the determination of effect on all properties identified in the documents provided to the consulting parties on January 20, 2016. Staff has begun brainstorming ways to resolve the adverse effects to the Theodore Wirth Segment of the Grand Rounds Historic District. In preparation for future consultation, staff suggests that the following measures be considered as ways to avoid, minimize, and mitigate noise and visual effects that the Blue Line Extension Project may have in this area:

- Alternative Building Materials used on Vertical Circulation structures at Golden Valley Road and Plymouth Stations (stone or other materials that were often used during the period of historical significance and that complement the natural setting are desired)
- Interpretive Signage and Wayfinding Signage (to acknowledge and share the importance of this historical and cultural resource)
- Rename Plymouth Station to a name that better acknowledges the history of this area (Theodore Wirth Park Station or Wirth Regional Park Station are suggested options)
- Addition of Recreational Facilities and Accommodations to Golden Valley Road and Plymouth Stations (runnels for bicycles and taller elevators that accommodate the height of downhill skis are examples of ways that station design can acknowledge and promote the unique recreational opportunities provided in the area)
- Increased Vegetation near areas where vegetation must be removed for the Blue Line Extension Project

Please let me know if you have any clarifying questions regarding this feedback. We look forward to continued consultation on this subject.

Sincerely,

A handwritten signature in black ink that reads "Emily Goellner".

Emily Goellner  
Associate Planner/Grant Writer



cc: Sara Beimers, State Historic Preservation Office, Minnesota Historical Society  
Kathryn O'Brien, Metropolitan Council  
Caroline Miller, Metropolitan Council  
Adam Arvidson, Minneapolis Park and Recreation Board  
Jim Voll, City of Minneapolis  
Brent Rusco, Hennepin County

## STATE HISTORIC PRESERVATION OFFICE

February 22, 2016

Marisol Simon  
Federal Transit Administration  
200 West Adams Street, Suite 320  
Chicago IL 60606-5253RE: Blue Line LRT Extension Project  
Hennepin County, Minnesota  
SHPO Number: 2011-3773

Dear Ms. Simon:

Thank you for continuing consultation on the above project. Your agency's final determination of effect for the proposed Federal undertaking has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, and to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We have completed our review of the following documentation for the undertaking which was prepared pursuant to 36 CFR 800.11(e) and received in our office on 21 January 2016:

- Federal Transit Administration (FTA) letter to Minnesota State Historic Preservation Office (SHPO) dated January 20, 2016;
- Report entitled *Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties* (January 2016);
- Blue Line LRT Extension, Section 106 Process Design Documents;
- Technical Memoranda in regards to traffic/access and noise/vibration impacts to historic properties;
- Station Area Planning Documents for Plymouth Avenue, Golden Valley Road, Van White Boulevard, Penn Avenue, and Robbinsdale stations;
- Meeting notes from 7/10/15 and 7/16/15 Section 106 Consultation Meetings.

We also participated in the Section 106 Consultation meeting which was held at the Blue Line Project Office on 2/4/2016.

We concur with your agency's determination that the undertaking, as currently proposed and presented at the approximately 15% design stage, will have **no adverse effect** on the following historic properties:

- **Minneapolis Warehouse Historic District** (HE-MPC-0441), Minneapolis
- **St. Paul Minneapolis & Manitoba Railroad/Great Northern Railway Historic District** (XX-RRD-010), Minneapolis
- **Northwestern Knitting Company Factory** (HE-MPC-8125), Minneapolis
- **Bridge No. L9327** (HE-GVC-0050), Golden Valley

- Jones-Osterhus Barn (HE-RBC-264), Robbinsdale
- Minneapolis & Pacific Railway/Soo Line Railway Historic District (HE-CRC-199), Crystal

We concur with your agency's determination that the undertaking, as currently proposed and presented at the approximately 15% design stage, will have **no adverse effect** on the following historic properties ***provided that appropriate project design and implementation measures, as outlined in the effects assessment report, are developed through additional consultation with our office and consulting parties, and included as conditions in an executed Section 106 agreement document for this undertaking:***

- Sumner Branch Library (HE-MPC-8081), Minneapolis
- Labor Lyceum (HE-MPC-7553), Minneapolis
- Sacred Heart Catholic Church (HE-RBC-1462), Robbinsdale
- Robbinsdale Waterworks (HE-RBC-286), Robbinsdale
- Hennepin County Library, Robbinsdale Branch (HE-RBC-024), Robbinsdale

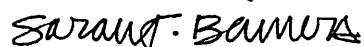
In regards to the "no adverse effect" findings above for which we have provided concurrence, if your agency determines that the project will not be carried out as proposed, then your agency will need to reopen Section 106 consultation pursuant to 36 CFR 800.5(a).

We concur with your agency's determination that the undertaking, as currently proposed and presented at the approximately 15% design stage, will have an **adverse effect** on the following historic properties:

- Wayman A.M.E. Church (HE-MPC-8290), Minneapolis
- Floyd B. Olson Memorial Statue (HE-MPC-9013), Minneapolis
- Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad/Great Northern Railway Historic District (HE-RRD-002, HE-MPC-16389, HE-RBC-0304, HE-CRC-0238, HE-BPC-0084), Minneapolis, Golden Valley, Robbinsdale, Crystal, Brooklyn Park, and Osseo
- Grand Rounds Historic District (XX-PRK-0001), Theodore Wirth Segment, Minneapolis, Golden Valley, and Robbinsdale
- Homewood Residential Historic District (HE-MPC-12101), Minneapolis
- West Broadway Avenue Residential Historic District (HE-RBC-159), Robbinsdale

We look forward to continuing consultation as we work with the FTA and consulting parties to develop a Section 106 Memorandum of Agreement for this undertaking. This agreement document will need to outline measures to resolve adverse effects through effective and publicly beneficial mitigation, as well as integrate measures for avoidance and minimization of adverse effects. In the meantime, if you have any questions or concerns regarding this comment letter, please feel free to contact me at 651-259-3456 or [sarah.beimers@mnhs.org](mailto:sarah.beimers@mnhs.org).

Sincerely,



Sarah Beimers, Manager  
Government Programs & Compliance



U. S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION V  
Illinois, Indiana,  
Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253  
312-353-2789  
312-886-0351 (fax)

February 29, 2016

Reid Nelson, Director  
Office of Agency Programs  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue NW, Suite 803  
Washington, D.C. 20004

RE: Notice of Adverse Effect for the METRO Blue Line Extension Light Rail Transit Project, Hennepin County, Minnesota and Invitation to Participate in Section 106 Consultation

Dear Mr. Nelson:

We are writing to invite the Advisory Council on Historic Preservation to participate in Section 106 consultation related to the proposed METRO Blue Line Extension Light Rail Transit Project (Project), located in Hennepin County, Minnesota. The project will provide transit connections between downtown Minneapolis and activity centers in Hennepin County, including the cities of Maple Grove, Brooklyn Park, Crystal, Robbinsdale, and Golden Valley. FTA is the lead Federal agency and the Metropolitan Council is the local lead agency and Project sponsor.

Subsequent to Section 106 initiation in 2011, FTA conducted consultation for the proposed Project with the various consulting parties, including the Minnesota Historic Preservation Office (MnHPO). FTA made determinations as to the Area of Potential Effect (APE) and associated properties on or eligible for the National Register of Historic Places (NRHP). FTA has also determined that the undertaking will have adverse effects on historic properties pursuant to 36 C.F.R. § 800.5. FTA and the MnHPO will prepare a Memorandum of Agreement (MOA) to address these adverse effects pursuant to 36 C.F.R. § 800.6. Background information on the proposed Project, historic properties, and potential effects is included in the attached ACHP e106 Form and other supporting documentation provided for your review.

With this letter, FTA would like to extend the ACHP an opportunity to participate in the Section 106 process for the proposed Project, including development of the MOA pursuant to 36 C.F.R. § 800.6(a)(1). Your input will help us ensure associated effects on historic resources are given due consideration as the Project progresses. Please contact Reggie Arkell, Community Planner, at (312) 886-3704 or [reginald.arkell@dot.gov](mailto:reginald.arkell@dot.gov) if you have any questions. Thank you.

Sincerely,

Marisol R. Simón  
Regional Administrator

RE: Notice of Adverse Effect for the Bottineau Light Rail Transit Project, Hennepin County, Minnesota  
and Invitation to Participate in Section 106 Consultation

Enclosures

ec: Kathryn O'Brien, Metropolitan Council  
Kristen Zschomler, Minnesota Department of Transportation Cultural Resources Unit  
Craig Lamothe, Metropolitan Council  
Reggie Arkell, Federal Transit Administration



## Minnesota Department of Transportation

### Office of Environmental Services

Mail Stop 620  
395 John Ireland Boulevard

Office Tel: (651) 366-4291  
Fax: (651) 366-3603  
renee.barnes@state.mn.us

March 10, 2016

Ms. Sarah Beimers, Manager Government, Programs & Compliance  
Historic Preservation Office, Minnesota Historical Society  
345 Kellogg Blvd. W., St. Paul, MN 55102

RE: Reevaluation of the Boundaries for the Floyd B. Olson Memorial Statue, TH 55, Minneapolis,  
Hennepin County

Dear Ms. Beimers,

As per our delegation of authority to determine eligibility of properties on behalf of FHWA under the terms of the 2015 Programmatic Agreement, we are conducting this review as per 36 CFR 800.4(c)(1) – (reevaluation of properties previously determined eligible).

The Floyd B. Olson Memorial Statue (HE-MPC-9013) was previously determined eligible by our office in 1998 under Criterion C for Design Significance within the Roadside Development on Minnesota Trunk Highways, 1920-1960, and your office concurred. The original site plans for the property were recently found providing new information on the design intent of the original setting for the statue, so a reevaluation is warranted.

The Floyd B. Olson Memorial Statue was erected in 1940, three years after Trunk Highway (T.H.) 55 was designated as Floyd B. Olson Memorial Highway, after Minnesota's 22<sup>nd</sup> governor. The statue was designed and executed by Carl Brioschi (senior designer), A. (Amerigo) J. Brioschi, and L. R. Kirchner. The statue was originally located within an elaborately designed site within the TH 55 median between opposing traffic lanes (see attached plan). The site consisted of a long sidewalk edged with low shrubs (Alpine currants) beginning at Oliver Avenue North and extending east to roughly the middle of the block. A semi-rectangular plaza area was located in the middle of the block, and was also lined with shrubs. The statue was located on the plaza atop a plinth facing east. There are no benches indicated on the site plan; however, a (very small) photograph from presumably the 1940s shows a bench on the south side of the plaza. It is further presumed that there was a matching bench to the north, but the shrubs in the photograph block that area. The bench in the photograph matches the extant benches, so it is assumed that these were on the original site and were moved along with the statue. Behind the statue were 10 plantings of Red Cedar, and American Elms were spaced along the edges of the roadway along both sides of the full block (see enclosed aerial showing original plans, original plan details, and photograph). In all, the original site design consisted of a long, formal walkway oriented east-west, edged by vegetation, creating a passageway to the statue, which is somewhat buffered from the highway through the stand of trees to the west.

Due to widening of TH 55 from four to six lanes in 1984, the statue was moved to the south side of TH 55 to the southeast corner of the intersection of Penn Avenue North and Olson Memorial Highway (see map). The orientation of the statue was switched to face north, and the walkways were severely truncated into small narrow connections on the east and north. The statue was placed on a circular plaza, and was lined with low shrubs. There is no formal landscaping on the remainder of the property.

Gemini Research surveyed the site as part of their 1998 "Historic Roadside Development Structures on Minnesota Trunk Highways." During this survey the statue was recommended eligible for listing in the National Register of Historic Places (NRHP) under Criterion C. The statue was recommended as significant as one Twin City sculptor's earliest and most important works. The property was evaluated under the historic context "Roadside Development on Minnesota Trunk Highways, 1920-1960."

Based on the 1998 survey, in 2004, the site boundaries were recommended as: "The northern boundary of the National Register-eligible property follows the southern curblineline of TH 55 (Olson Memorial Highway). The western boundary follows the eastern curblineline of Penn Avenue. The southern boundary follows the northern edge of the alley immediately south of the statue. The eastern

boundary is aligned with the western edge of the north sidewalk that is located about 110' east of the statute (near the eastern side of Oliver Avenue), as shown." (see enclosed Site Boundary document.) The justification for this boundary is that it "generally includes the parcel of land historically associated with the memorial park." This is inaccurate, since the form also acknowledges that the property was moved in 1984; therefore, the boundaries cannot represent the land historically associated with the memorial park. It may have been believed that the relocated site matched the original design, and that perhaps it could be considered part of the historic boundary if it was an exact or very close replica. However, based on the recently identified site plans from the 1940s and supporting photographs, it is clear that the new setting for the statue does not match the original. The site therefore does not retain integrity of location, design, setting, materials, workmanship, feeling and association.

Therefore it is the determination of our office that the boundaries as presented in 2004 are not appropriate. The statue is significant under Criterion C and Criteria Consideration B for its association with Carl Brioschi, the sculptor; however, the statue should no longer be associated with the historic context "Roadside Development on Minnesota Trunk Highways, 1920-1960," since the original roadside development site is no longer extant in the median of TH 55. In addition, there was no effort in 1984 to recreate the original site plan and the 1984 site is far different in size, shape and materials than the original plan. The revised boundaries should therefore be limited to the extant historic materials - the statue and the base on which it sits (please see the enclosed revised boundaries). The benches appear to have been original historic fabric to the original site; however, they do not meet Criteria Consideration B for a moved property since they have been placed in an inappropriate site that does not convey the original design intent.

We are respectively requesting a two week turn-around for your concurrence and/or comments. Please reply by March 24, please let me know if you have any questions prior to this date. If you have questions or concern, I would welcome the opportunity to discuss directly with you, so please call me at 651.366.4291.

Sincerely,



Renée Barnes, Historian  
Cultural Resources Unit

Enclosures

cc: Kristen Zschomler, MnDOT CRU  
Greg Mathis, MnDOT CRU  
Kathryn McFadden, MnDOT Site Development Unit



# Floyd B. Olson Memorial Statue National Register Boundaries



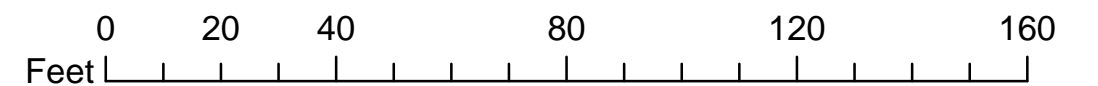
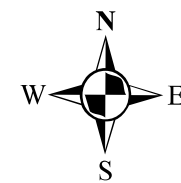
DATE: 3/10/2016



CULTURAL RESOURCES UNIT

## Legend

- BLRT Track Alignment
- BLRT Civil Site
- 2004 Recommended Boundary
- BLRT Survey Topography
- Original Monument Site
- Revised NRHP Boundaries







Preserving America's Heritage

March 15, 2016

Mr. Reggie Arkell, AICP  
Community Planner  
Federal Transit Administration-Region V  
200 West Adams Street, Suite 320  
Chicago, IL 60606

Ref: *Proposed METRO Blue Line Extension Light Rail Transit Project  
Hennepin County, Minnesota*

Dear Mr. Arkell:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Minnesota State Historic Preservation Office (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Christopher Wilson at 202-517-0229 or via e-mail at [cwilson@achp.gov](mailto:cwilson@achp.gov).

Sincerely,

LaShavio Johnson  
Historic Preservation Technician  
Office of Federal Agency Programs

March 28, 2016

Ms. Renee Hutter Barnes  
MnDOT Cultural Resources Unit  
Office of Environmental Services  
Transportation Building, MS 620  
395 John Ireland Blvd  
St. Paul, MN 55155

RE: Reevaluation of the Boundaries for the Floyd B. Olson Memorial Statue  
Minneapolis, Hennepin County  
SHPO Number: 2016-1861

Dear Ms. Barnes:

Thank you for the opportunity comment on the above project. Information received on 10 March 2016 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, and per the terms of the 2005 Programmatic Agreement between the Federal Highway Administration, the Minnesota Department of Transportation and the Minnesota State Historic Preservation Office.

By your letter dated 10 March 2016, you have requested that our office review your agency's reevaluation and determination of the historic property boundary for the **Floyd B. Olson Memorial Statue** (HE-MPC-9013) a property previously determined eligible for listing in the National Register of Historic Places (NRHP). Since the Minnesota Department of Transportation (MnDOT) does not currently have a proposed Federal undertaking which has the potential to affect this historic property at this time, we do not believe reference to 36 CFR 800.4(c)(1) is applicable as these regulations apply to identification of historic properties during the Section 106 review process for a specific undertaking.

Your agency is aware of the fact that this historic property is located within the area of potential effect (APE) for the Bottineau/Blue Line Extension Light Rail Project, a Federal undertaking of the Federal Transit Administration currently under Section 106 review.

We have completed our review of your reevaluation as well as our records for the historic property, records which include two (2) previous evaluations for the historic property:

- The initial identification and evaluation completed by Gemini Research in 1997 as part of the statewide survey which resulted in the report entitled *Historic Roadside Development Structures on Minnesota Trunk Highways* (1998) which resulted in a *Minnesota Historic Roadside Development Structures Inventory Form* (December 1998) with supplemental property boundary maps dated from 2003; and

- An updated architecture-history inventory form completed by the 106 Group in 2012 as part of the cultural resources survey completed for the “Bottineau Transitway” (Blue Line Extension) project.

For clarification, the historic property was recommended as eligible for listing in the NRHP as part of the 1998 statewide survey, and although Gemini Research determined that the statue had been turned to face north, from its original east facing position, they did not realize that the statue had been moved from its original location in the Trunk Highway 55 median. We believe that this is likely why Gemini Research included the entire surrounding park area and plaza in their property boundary delineation.

In 2012, the 106 Group’s updated inventory form confirms this initial oversight by Gemini as well as provides clarification regarding the move and a full NRHP evaluation taking into account the statue’s significance and move to the south side of the highway in 1984 by MnDOT. From our office’s perspective, we feel that the evaluation completed in 2012 is the most comprehensive in terms of the determining the historic property’s significance, except for the fact that this evaluation did not specifically address or reconfirm the property’s boundaries.

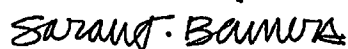
We agree with your agency’s determination that the Floyd B. Olson Memorial Statue remains eligible for listing in the National Register of Historic Places under Criterion C in the area of Art, as the work of master sculptor Carlo Brioschi and satisfies Criteria Consideration B: Moved Properties as the current setting and environment are compatible with the statue’s monumental significance and the historic location of the statue adjacent to the Olson Memorial Highway/Trunk Highway 55 near Penn Avenue North in Minneapolis. The Period of Significance for the historic property is 1940.

It is important to clarify that the statue is categorized as an *object* per the NRHP guidelines which state that “although it may be, by nature or design, moveable, an object is associated with a specific setting or environment.” This is an especially important consideration for the Floyd B. Olson Memorial Statue.

Finally, we agree with your agency’s determination of the revised NRHP-eligible property boundaries to include the statue, granite pedestal, and granite terraced base as illustrated on the *Floyd B. Olson Memorial Statue National Register Boundaries* site plan dated 3/10/2016. This smaller boundary is consistent with National Register guidelines for selecting boundaries for this type of property.

Please contact me at 651-259-3456 or [sarah.beimers@mnhs.org](mailto:sarah.beimers@mnhs.org) if you have any questions regarding this comment letter.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs & Compliance