

Appendix H Supporting Documentation
Section 106 Consulting Party Comments

APPENDIX H

Section 106 Consulting Party Comments

1. Letter from MnDOT CRU to MnHPO, September 28, 2010
2. Letter from MnHPO to MnDOT CRU, October 29, 2010
3. Letter from MnDOT CRU to MnHPO, December 16, 2010
4. Letter from MnHPO to MnDOT CRU, January 20, 2011
5. Letter from MnDOT CRU to MnHPO, April 20, 2011
6. Letter from MnDOT CRU to MnHPO, April 29, 2011
7. Letter from MnHPO to MnDOT CRU, May 20, 2011
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14. Letter from MnDOT CRU to MnHPO, November 9, 2011
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16. Letter from MnDOT CRU to MnHPO, February 10, 2012
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27. Letter from MnHPO to MnDOT CRU, March 12, 2013
28. Email letter from MnHPO to MnDOT CRU, March 21, 2013
29. Letter from FTA to Three Rivers Park District, April 10, 2013
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31. Letter from MnDOT CRU to MnHPO, February 27, 2014
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37. Email letter from the City of Minneapolis to MnDOT CRU, May 16, 2014
38. Letter from Minneapolis Park & Recreation Board (MPRB) to MnDOT CRU, May 16, 2014
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49. Letter from Preservation Design Works, LLC/Kenwood Isles Area Association (KIAA) to MnDOT CRU, November 12, 2014
50. Letter from Preservation Design Works, LLC/KIAA to MnDOT CRU, December 10, 2014
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53. Letter from the City of Minneapolis to MnDOT CRU, December 15, 2014
54. Email letter from Cedar-Isles-Dean Neighborhood Association (CIDNA) to MnDOT CRU, January 21, 2015
55. Email letter from MnDOT CRU to Cedar-Isles-Dean Neighborhood Association (CIDNA), January 28, 2015
56. Email letter from MnHPO to MnDOT CRU, February 2, 2015
57. Letter from FTA to CIDNA, February 17, 2015
58. Letter from KIAA to MnDOT CRU, March 2, 2015
59. Letter from the City of Minneapolis to MnDOT CRU, March 5, 2015
60. Letter from MPRB to MnDOT CRU, March 5, 2015
61. Letter from MnHPO to MnDOT CRU, March 9, 2015
62. Letter from KIAA to MnDOT CRU, March 23, 2015
63. Letter from CIDNA to MnDOT CRU, March 24, 2015

64. Letter from MnDOT CRU to MnHPO, May 4, 2015
65. Letter from KIAA to MnDOT CRU, May 15, 2015
66. Letter from MPRB to MnDOT CRU, May 27, 2015
67. Letter from MnHPO to MnDOT CRU, May 28, 2015.
68. Letter from the City of Minneapolis to MnDOT CRU, June 1, 2015.
69. Letter from MnHPO to MnDOT CRU, June 8, 2015
70. Letter from CIDNA to MnDOT CRU, July 14, 2015
71. Letter from CIDNA to MnDOT CRU, August 20, 2015
72. Letter from MPRB to MnDOT CRU, August 21, 2015
73. Letter from MnHPO to MnDOT CRU, August 21, 2015
74. Letter from KIAA to MnDOT CRU, August 25, 2015
75. Letter from the City of Minneapolis to MnDOT CRU, August 25, 2015
76. Letter from KIAA to MnDOT CRU, October 18, 2015
77. Letter from MPRB to MnDOT CRU, October 19, 2015.
78. Letter from MnHPO to MnDOT CRU, October 26, 2015
79. Letter from MnHPO to MnDOT CRU, November 5, 2015
80. Letter from MnHPO to MnDOT CRU, December 14, 2015
81. Letter from CIDNA to MnDOT CRU, December 17, 2015
82. Letter from KIAA to MnDOT CRU, December 17, 2015
83. Letter from St. Louis Park Historical Society, December 17, 2015.
84. Letter from the City of Minneapolis to MnDOT CRU, December 18, 2015
85. Letter from MPRB to MnDOT CRU, December 18, 2015.
86. Letter from MnHPO to MnDOT CRU, March 3, 2016
87. Email letter from the City of Eden Prairie to MnDOT CRU, March 7, 2016.
88. Letter from the City of Minneapolis to MnDOT CRU, undated, 2016
89. Letter from MPRB to MnDOT CRU, March 7, 2016



Minnesota Department of Transportation

Office of Environmental Services

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

28 September 2010

Dr. Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase IA
Archaeological Investigation (SHPO # 2009-0080)

Dear Mary Ann:

We are writing to continue Section 106 consultation on the above referenced project. As you know, the Federal Transit Administration (FTA) initiated this consultation with letters to your office of 6 November 2009 and 17 December 2009, designating our office to lead the 106 process on their behalf. Subsequently, on 16 February 2010, we held a consultation meeting at your offices to discuss the survey research design for the project. Representatives of the Hennepin County Regional Rail Authority, the Minneapolis Heritage Preservation Commission, the Eden Prairie Heritage Preservation Commission, the Preservation Alliance of Minnesota, and FTA (by telephone) attended that meeting.

To recap, five potential project segments have been identified (see enclosed map). From west to east, these segments are as follows:

- Segment 1, from a Hwy 5 Station in Eden Prairie to a Shady Oak Station in Hopkins.
- Segment 3, from a Mitchell Station in Eden Prairie to a Shady Oak Station in Hopkins.
- Segment 4, from a Shady Oak Station in Hopkins to a West Lake Station in Minneapolis.
- Segment A, from a West Lake Station in Minneapolis to an Intermodal Station in Minneapolis.
- Segment C, an alternate easterly route from a West Lake Station in Minneapolis to an Intermodal Station in Minneapolis.

These segments have been combined in various ways to form four project alternatives: 1A, 3A, and 3C (two variations). Hennepin County has identified 3A as the locally preferred alternative (comprised of segments 3, 4, and A).

Pursuant to the survey research design for the project, the following reports are now under preparation or are recently completed:

- Phase IA archaeological investigation (Archaeological Research Services and HDR Engineering).
- Phase I/II architecture history survey of the following survey zones: Eden Prairie, Minnetonka, Hopkins, and St. Louis Park (Mead & Hunt).
- Phase I/II architecture history survey of the following survey zones: Minneapolis and St. Louis Railroad, Chicago Milwaukee and St. Paul Railroad, Minneapolis Northfield and Southern Railroad, and Great Northern Railroad (Summit EnviroSolutions).
- Phase I/II architecture history survey of the following survey zones: Minneapolis West Residential, Minneapolis South Residential/Commercial, Minneapolis Downtown, Minneapolis Industrial, and Minneapolis Warehouse (Hess Roise).

As part of our continuing consultation on historic property identification and evaluation, we will submit these reports to you for review as they become available. This letter transmits the report of the phase IA archaeological investigation. The assessment fulfills task one of the archaeological portion the survey research design (included in the report as Appendix A). It identifies areas of archaeological potential in all five project segments. The Phase I-II archaeological survey will be based on recommendations in this report.

Please submit comments on this report within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651 366 4292 with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dennis Gimmestad". The signature is written in a cursive, slightly slanted style.

Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County Regional Rail Authority
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Mn/DOT CRU project file



State Historic Preservation Office

October 29, 2010

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for providing the Phase 1A archaeological assessment for the above-referenced project. It has been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), and the provisions of the Minnesota Historic Sites Act.

The Phase IA archaeological assessment report was prepared by Christina Harrison and Michael Madson (Sept 2010). This is a large and complex project, and the report does an excellent job of scoping out an appropriate archaeological survey strategy. The investigators used a combination of background research, GIS analysis and on-the-ground assessment. It is an appropriate approach for this study area, where the history of urban development would otherwise limit potential results if only one of these techniques were to be used.

As the report states, the Area of Potential Effect for some portions of the project may need to be revised as the planning progresses, but we concur with the tentative APE as recommended. Overall, we find that the recommendations set out in this report present an appropriate approach for starting the archaeological survey investigations

We look forward to receiving and reviewing the Phase I - II survey results. When these results are reported, it would be helpful to include the relevant reference material for each area (Sanborn or plat maps, etc., as cited in this report).

Please contact David Mather of our office at 651-259-3454 if you have questions on this review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Ann Heidemann', written over a light blue horizontal line.

Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission
John Gertz, Eden Prairie Heritage Preservation Commission



Minnesota Department of Transportation

Office of Environmental Services

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

16 December 2010

Dr. Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II
Architecture History Investigations for the Proposed Southwest Transitway Project,
Volumes One and Three (SHPO # 2009-0080)

Dear Mary Ann:

We are writing to continue Section 106 consultation on the above referenced project.

Our last letter to you on this project, transmitting the report of the phase 1A
archaeological investigations, was dated 28 September 2010. Thank you for your
response to that submittal.

This letter transmits Volumes One and Three of the architecture/history investigations
for the project. Volume One (Mead & Hunt, September 2010) encompasses four
survey zones, constituting the four suburban areas of the project (excluding railroad
properties). This volume includes Eden Prairie, Minnetonka, Hopkins, and St. Louis
Park. Volume Three (Summit EnviroSolutions, October 2010) encompasses four
survey zones, constituting the four historic railroad corridors located throughout the
project area. This volume includes the following railroads: Minneapolis and St.
Louis, Chicago Milwaukee and St. Paul, Minneapolis Northfield and Southern and
Great Northern. Volume Two, still in preparation, encompasses the survey zones
located within the city of Minneapolis (excluding railroad properties).

Volume One Evaluations. We have made the following determinations of eligibility
for architecture/history properties in the Eden Prairie, Minnetonka, Hopkins, and St.
Louis Park survey zones (refer to Table 6 on page 117, Volume One). Keep in mind
that railroad properties in these areas are included in Volume Three.

1. The following properties meet National Register of Historic Places (NRHP) criteria:
 - A. **Hopkins City Hall**, HE-HOC-026, Hopkins
 - B. **Hopkins Downtown Commercial Historic District**, HE-HOC-027, Hopkins
 - C. **Motor Travel Services Building**, HE-SLC-055, St. Louis Park (We acknowledge that this property will become 50 years old in 2013. The evaluation report has not established a basis whereby this property would meet criteria consideration G, for properties newer than 50 years. However, it is anticipated that the property will turn 50 years old during the planning and design of this project. We ask that you consider its eligibility at this time so that potential effects to the property can be considered throughout the design process as project planning moves forward.)

2. The following property was previously listed in the NRHP:
 - A. **Peavey-Haglin Experimental Concrete Grain Elevator**, St. Louis Park (also a National Historic Landmark).

3. The survey report recommends that the Lang House, HE-MKC-101, located in Minnetonka, meets NRHP criteria. This house is an interesting adaptation of construction technology and building form characteristic of the modernist period of the 1960s. However, we feel that there is not an adequate basis to conclude that the use of modernist techniques and elements by Keith Lang in the design for his 1966 residence is particularly significant. We also note that the roof appears to be based on the form of a hyperbolic paraboloid (rather than an elliptic paraboloid, as the report indicates), but that it is not a true hyperbolic paraboloid. We conclude that the property does not meet NRHP criteria.

4. The survey report recommends that the Woodmark Industries Building, HE-SLC-052, located in St. Louis Park, meets NRHP criteria. This 1946 building is a well-preserved example of the integration of industrial design elements (particularly the sawtooth roof) with the aesthetic features of the Streamline Moderne style. The evaluation compares the property with two other similar buildings from the same period by architects Lang and Raugland. While the industrial elements and Moderne style features are characteristic and competent, we conclude that there is not an adequate basis to establish that the particular combination of elements in the Woodmark Building is significant under NRHP criteria.

Volume Three Evaluations. We have made the following determinations of eligibility for architecture/history properties in the four railroad survey zones (refer to Table 5 on page 67, Volume Three).

1. The following properties meet NRHP criteria:
 - A. **Minneapolis and St. Louis Railroad Depot**, HE-HOC-14, Hopkins
 - B. **St. Paul Minneapolis and Manitoba/Great Northern Railroad Corridor**, HE-MPC-16387, Minneapolis (and beyond)

2. The following properties are listed in the NRHP:
 - A. **Chicago Milwaukee and St. Paul Railroad Depot**, St. Louis Park
 - B. **Chicago Milwaukee and St. Paul Railroad Grade Separation**, Minneapolis

3. The following properties have been previously evaluated as eligible to the NRHP:
 - A. **Osseo Branch Line, St. Paul Minneapolis and Manitoba/Great Northern Railroad**, Minneapolis (and beyond) (SHPO report #XX-2009-2H, file #2009-3656)
 - B. **Grand Rounds Historic District**, Minneapolis (includes three contributing bridges [HE-MPC-05341, HE-MPC-01835, HE-MPC-05335] of the Chicago Milwaukee and St. Paul Railroad)

Volume Two of the architecture/history investigations, covering the survey zones in Minneapolis, will be submitted for review when complete.

Please submit comments on these determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651 366 4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County Regional Rail Authority
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Mn/DOT CRU project file



Minnesota
Historical Society

State Historic Preservation Office

January 20, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for providing Volumes One & Three of the SW Transitway Phase I & II Architectural Survey Work. The reports and inventory sheets have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), and the provisions of the Minnesota Historic Sites Act.

Volume One (Mead & Hunt, September 2010) covers four suburban areas: Eden Prairie, Minnetonka, Hopkins and St. Louis Park (excluding rail corridors). Volume Three (Summit EnviroSolutions, October 2010) encompasses the four historic rail corridors located in the project area. Our comments are provided below.

Volume One Comments:

1. **We concur that the Hopkins City Hall, Hopkins Downtown Commercial Historic District and Motor Travel Services Building are eligible for the National Register.** However, we suggest some revisions to strengthen the documentation, as noted below.
 - a. **Hopkins City Hall:** We do not believe that the Criterion A theme of Community Planning and Development is an appropriate one for the Hopkins City Hall; or at least it is not supported by the materials submitted. Please consider a more appropriate area of significance (meeting municipal needs of a growing community?) or provide better documentation on significance to community planning.
 - b. **Hopkins Downtown Commercial Historic District:** Please document the extent of the Hopkins downtown business district during the historic period, to establish that the remaining "core" adequately evokes the setting and feeling of the district during the period of significance. The discussion of district alteration and loss on p. 50 seems to raise questions about the remaining district's integrity that need to be resolved.
 - c. **Motor Travel Services Building:** The reference to Modern architectural styles used on p. 115 is vague. Given that the architect was a student of Frank Lloyd Wright, and the building evokes Wright's later work, we feel putting the building in a

"Wrightian" context may be more helpful than saying it is simply a good example of the Modern style. Fine tuning the references to Wright will better explain why this building is in fact an important example of a distinctive type and period.

2. **We concur that the Land House and the Woodmark Industries Building are not eligible for the National Register.**
3. We request a number of editorial changes to the inventory sheets, as follow:
 - a. Is it Main Street or Mainstreet? Consistent usage on all forms and in the text is requested.
 - b. For a Phase II survey, some of the inventory sheets seem a bit thin. We suggest using local sources like the newspaper or building permits to provide additional information.
 - c. Please provide inventory forms or updates for all properties in the district. Six are missing.
 - d. 1007 Main Street (HE-HOC-148): The image is small, but doesn't look like a 1900 building.
 - e. 1014 Main Street (HE-HOC-152): If it is a 1930 building, the "integrity" needs re-evaluation.
 - f. State Bank of Hopkins (HE-HOC-155) 1002 Main Street on the form but 1004 in the text?
 - g. Larger images would be appreciated.

Volume Three Comments:

1. **We concur that the Minneapolis and St. Louis Railroad Depot (HE-HOC-14) and the St. Paul Minneapolis and Manitoba/Great Northern Railroad Corridor (HE-MPC-16387) are eligible for the National Register.**
2. Table 5 (p. 67) seem to have several errors in site numbers that need to be cleared up. HE-EPC-268 should be HE-EPC-078. HE-SLC-519 already had a number (HE-SLC-008) and the original number should be retained. HE-MPC-01850 has been crossed out in the report copy sent here. Why?

Please send us the revisions and additions requested above. We look forward to working with you on the Minneapolis sections of the architectural survey, when they become available.

Give me a call if you have any further questions on this review.

Sincerely,



Jr Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission
John Gertz, Eden Prairie Heritage Preservation Commission



Minnesota Department of Transportation

Office of Environmental Services

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

20 April 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II Architecture History Evaluations, Volume Two (part), Minneapolis Downtown Survey Zone (SHPO # 2009-0080)

Dear Dr. Heidemann:

We are writing to continue Section 106 consultation on the Southwest Transitway (SWT) project.

Our last letter to you on this project, transmitting Volume One (four suburban zones) and Volume Three (four railroad zones) of the Phase I/Phase II Architecture History Investigations, was dated 16 December 2010. We appreciate your response to that submittal. We are in the process of compiling the information you requested, and will be forwarding that material to you under separate cover.

Volume Two of the survey report (Hess Roise) includes the five survey zones located within the city of Minneapolis. As you know, these survey zones include a large number of evaluations, and we appreciate your willingness to review the individual zones as they are completed. This submittal includes the two sections of the report (Section 3.3 and Section 4.3) which pertain to the Minneapolis Downtown Survey Zone, the list of properties surveyed (Appendix A), and the overall survey research design (Appendix B). The submittal also includes the inventory forms for the Downtown Zone.

You will note that the binder has sections for all five Minneapolis survey zones included in Volume Two. Please regard the copies of Sections 3.3 and 4.3 as the final copy for these sections. Future submittals can be placed in the remaining sections to build the complete Volume Two.

With regard to historic properties in the SWT Downtown Survey Zone, we have made the following determinations:

1. The following properties are listed in the National Register of Historic Places (NRHP):
 - A. **Basilica of St. Mary** (HE-MPC-0540), 1600 Hennepin Ave.
 - B. **Farmers and Mechanics Savings Bank** (HE-MPC-0354), 88 S. 6th St.
 - C. **Masonic Temple** (HE-MPC-0436), 528 Hennepin Ave.
 - D. **Ogden Apartment Hotel** (HE-MPC-0394), 66-68 S. 12th St.
 - E. **Hennepin (Orpheum) Theatre** (HE-MPC-0439), 910 Hennepin Ave.
 - F. **Pence Automobile Company Building** (HE-MPC-9026), 800 Hennepin Ave.
 - G. **Swinford Townhouses and Apartments** (HE-MPC-0520, HE-MPC-0521), 1213-21, 1225 Hawthorne Ave.
 - H. **Sam S. Shubert Theatre** (HE-MPC-0514), 515 Hennepin Ave.
 - I. **Westminster Presbyterian Church** (HE-MPC-0395), 83 S. 12th St.

2. The following properties have been previously evaluated as eligible to the NRHP, with SHPO concurrence:
 - A. **Handicraft Guild Building** (HE-MPC-0382), 1000 Marquette Ave.
 - B. **IDS Center** (HE-MPC-0367), 701 Nicollet Mall
 - C. **Northwestern National Life Insurance** (HE-MPC-0479), 20 Washington Ave.
 - D. **Warner Brothers Picture Distribution Building** (HE-MPC-0421), 1000 Curie Ave. N.

3. The following properties meet NRHP criteria, based on the findings of this survey and the information noted below:
 - A. **Peavey Plaza** (HE-MPC-3620), 1101 Nicollet Mall, criterion C (landscape architecture, modernist) and criteria consideration G. In the absence of data categories for landscape architecture classification in the NRHP Guidelines, the classification system developed by The Cultural Landscape Foundation at <http://tclf.org/landscapes/glossary> has been used. At this time, we do not conclude that the property meets criterion A (planning and community development).
 - B. **Loring Greenway** (HE-MPC-0534), 1228 Nicollet Mall, criterion C (landscape architecture, modernist) and criteria consideration G. (In the survey report, see the Loring Park Development District Historic District, HE-MPC-16390.) Inasmuch as the Loring Greenway and Peavey Plaza are both modernist landscapes that were designed by M. Paul Friedberg and Associates for the City of Minneapolis during the same period, with the goal of connecting the Nicollet Mall and Loring Park, we conclude that the Loring Greenway meets NRHP criteria as a modernist landscape on the same basis as Peavey Plaza.

- C. **Minneapolis Film Exchange Historic District** (HE-MPC-16980), 1000, 1015, 1019, 1025 Currie Ave. N., criterion A (entertainment/recreation).
 - D. **First Baptist Church and Jackson Hall** (HE-MPC-0432), 1020 & 1026 Harmon Place, criterion B (religion) and criteria consideration A.
 - E. **Young-Quinlan Building** (HE-MPC-2999), 901 Nicollet Mall, criterion A (commerce), criterion B (commerce).
 - F. **Dayton's Department Store** (HE-MPC-5099), 700 Nicollet Mall, criterion A (commerce).
 - G. **Murray's Restaurant and Cocktail Lounge** (HE-MPC-0353), 24 S. 6th St., criterion A (commerce).
 - H. **Gluck's Bar** (HE-MPC-0350), 16 N. 6th St., criterion A (commerce).
 - I. **Northern States Power Company** (HE-MPC-0338), 15 S. 5th St., criterion A (industry). The evaluation lacks a substantive distinct justification for exceptional importance which is required under criteria consideration G. However, the period of significance for the property is 1915-1965, and, because the end of this period is expected to reach 50 years old during the planning and design of the SWT project, we ask that you consider the eligibility of the property at this time.
 - J. **Northern States Power Company** (HE-MPC-0450), 414 Nicollet Mall, criterion A (community planning and development). The Gateway urban renewal project is well-established as an important mid-20th century event in Minneapolis. The evaluation identifies characteristics which are strongly associated with properties in the Gateway project, including substantial private investment and design by a prominent architect. The NSP project brought Belluschi's design as well as \$12 million of private investment to the Gateway, compared to \$6.5 million for Northwestern National Life, \$11 million for the Sheraton Center, and \$2.5 for the IBM Building (see Martin and Goddard, *Past Choices/Present Landscapes*, p. 64). The evaluation lacks a substantive distinct justification for exceptional importance which is required under criteria consideration G. However, it is anticipated that the building will turn 50 years old during the planning of the SWT project, so we ask that you consider the eligibility of the property at this time.
4. The following properties are recommended as NRHP eligible in the survey report; it is our determination that they *do not* meet the criteria:
- A. **Happy Hour Bar and Café** (HE-MPC-7959), 1523 Nicollet Ave., criterion A (entertainment/recreation). This property was the Happy Hour Bar and Café from 1937-1947, Club Carnival from 1948-c. early 1950's, and the Flame from c. early 1950's-1978. Photographs of the building show the exterior during the Club Carnival and Flame periods (see MHS Visual Resources Database negative numbers 26594, 47839, 47840). Today, the two street facades retain the brick pattern and four circular windows. However, many of the building's major character-defining elements have been lost. These elements include the large

signage (including neon), entrance marquee, curved metal panels flanking the entrance, entrance doors, and large display panels on Nicollet Avenue for promoting club performers. It also appears that the interior has undergone substantial change in adapting it to a media production business. Due to the considerable loss of integrity, we conclude that this property does not meet NRHP criteria.

- B. **Loring Park Development District Historic District** (HE-MPC-16390), criterion A (planning and community development) and criteria consideration G. This district does constitute a distinguishable entity, encompassing properties which were built or incorporated into the area's redevelopment plan between 1974 and 1984. However, the importance of the district within a defined context of redevelopment efforts of the city is not clearly established, and the evaluation lacks the substantive distinct justification for exceptional importance which is required for recent properties under criteria consideration G (see Part IX of the National Register Bulletin "Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years"). We conclude that this district does not meet NRHP criteria at this time. (See 3.B. above for separate comment on the Loring Greenway as an individual property.)
- C. **Orchestra Hall** (HE-MPC-0459), 1100 Marquette Ave., criterion A and criteria consideration G. With respect to evaluation under criterion A (planning and community development), the importance of the building within a defined context of the redevelopment efforts of the city is not clearly established. With respect to evaluation under criterion A (performing arts), the evaluation discusses the importance of the orchestra from its founding in 1903, but the associations of the orchestra with this building do not begin until 1974. For either of these significance areas, the evaluation lacks the substantive distinct justification for exceptional importance which is required for recent properties under criteria consideration G. We conclude that this property does not meet NRHP criteria at this time.
- D. **Lincoln Bank Building** (HE-MPC-0437), 730 Hennepin Ave., criterion A (commerce). Lincoln Bank was established by Harry Pence at a location on South Third Street in 1917. The bank moved to newly-built 730 Hennepin Avenue in 1921, and became a branch of Northwestern National Bank in 1922. While the bank may have been a successful institution specializing in meeting the financial needs of the growing automotive industry, it appears that the activities associated with 730 Hennepin were more characteristic than particularly significant in this aspect of the banking industry. The activities of Harry Pence are most strongly associated with the Pence Automobile Company building, located at 800 Hennepin Avenue and listed on the NRHP in 2007. We conclude that the Lincoln Bank Building does not meet NRHP criteria.

- 5. The remaining Phase I and Phase II properties in the SWT Downtown Survey Zone do not meet NRHP criteria.

We will be submitting the evaluations of properties in the other Minneapolis survey zones as they become available.

Please submit comments on the Downtown Zone determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651 366 4292 with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dennis Gimmestad". The signature is written in a cursive style with a large, stylized initial "D".

Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Ed Hunter, Hennepin County
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Jack Byers, Minneapolis Heritage Preservation Commission
Mn/DOT CRU project file



Office of Environmental Services

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

29 April 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II Architecture History Evaluations, Volume Two (part), Minneapolis Industrial Survey Zone (SHPO # 2009-0080)

Dear Dr. Heidemann:

This letter transmits the Minneapolis Industrial Survey Zone portions of Volume Two of the History/Architecture Investigations for the Southwest Transitway Project. This is the second of five survey zones within Minneapolis which are included in Volume Two. We previously submitted the Minneapolis Downtown Survey Zone for your review.

The transmittal includes Section 3.4 (Literature Search for the Industrial Survey Zone), Section 4.4 (Results for the Industrial Survey Zone), and a list of surveyed properties in the Industrial Survey Zone (part of Appendix A). These sections can be integrated into the Volume Two binder previously submitted with the Downtown Survey Zone. Please regard the submitted materials on the Industrial Survey Zone as the final copy for those sections. Inventory forms for this zone are also included in this submittal.

With regard to historic properties in the SWT Industrial Survey Zone, we have made the following determinations:

1. No properties in this survey zone are currently listed in the National Register of Historic Places (NRHP).
2. The following property has been previously evaluated as eligible to the NRHP:

A. **Grand Rounds/The Parade** (HE-MPC-01782).

3. The following properties meet NRHP criteria, based on the findings of this survey:
 - A. **Dunwoody Institute** (HE-MPC-6641), 818 Dunwoody Boulevard, criterion A (education).
 - B. **Regan Brothers Bakery** (HE-MPC-16274), criterion A (industry).

4. The following property is recommended as NRHP eligible in the survey report; it is our determination that it does not meet the criteria:
 - A. **Glenwood Redevelopment Area Industrial Zone Historic District** (HE-MPC-16263), criterion A (community planning and development) and criteria consideration G.

This area represents an interesting part of the story of urban renewal in Minneapolis. However, after reviewing the evaluation, we conclude that the district does not meet National Register criteria.

The area of potential effect for the Southwest Transitway is confined to the area east of Lyndale Avenue, and the inventory of properties for the project is also confined to this area. However, as a historical entity, the Glenwood Redevelopment Area as a whole was a comprehensive, integrated plan with broad goals and strategies. It extended both to the east and to the west of Lyndale (which became the I-94 corridor). Therefore, the evaluation must consider the context and current status of the entire redevelopment area.

The Minneapolis HRA's 1954 Redevelopment Area Plan stated that the overall objective of the Glenwood project was "to replace a blighted neighborhood with a healthy one". It carefully defined the area that was considered blighted. It went on to list three primary objectives that were intended to reduce blight: 1) separation of land-uses (residential, commercial, and industrial), 2) improved traffic, and 3) adequate community facilities. The plan then discussed four "other community objectives" which would also be addressed: 4) streets and utilities, 5) tax improvement, 6) rental housing, and 7) industrial sites.

The plan (see attached 1954 maps of existing and proposed land uses) featured roughly 50% housing and 50% industry, and also included two shopping centers and other uses (including churches, school, fire station, playfield). Citing the lack of zoning control when the area was first built up, the plan called for separation of land uses as a cornerstone of the vision for the new neighborhood. The development was built largely as envisioned.

Today, the historical integrity of the overall development has been substantially compromised with the removal of virtually all of the project's

public housing, which was located between Lyndale and Girard at the heart of the redevelopment. These removals included the Glenwood Homes, the Lyndale Homes, and the (first) Olson Homes, built in the 1950s and removed in the 1990s, leaving the Art Love Manor building as the only apparent remaining historic public housing unit. The project also included a market rate housing component known as Girard Terrace, located at the western end of the redevelopment area between Irving and Girard. Surviving today from Girard Terrace are three large apartment buildings now known as Park Plaza Apartments, and a portion of a townhouse group now known as Olson Townhomes. The Olson Townhomes that remain have been rehabilitated with substantial changes to the original design. Those areas where the 1950s housing was removed are now being filled in with new construction and a lake.

The industrial area east of Lyndale (the area proposed as a historic district) comprised only a portion of the Glenwood project's industrial component (industrial sites being one of the "other community objectives"). The western portion of the industrial area, located west of Lyndale, also survives, although some of the buildings here have undergone substantial alteration.

Several of the individual components that were incorporated into the project, including Harrison School at 4th Ave. N. and Irving, Prince of Glory Church at 5th Ave. N. and Bryant, and the commercial strip along Olson Memorial Highway, have been removed or substantially remodeled.

Given the plan's primary objectives, realization of land use separation was a major character-defining feature of the redevelopment area. With the significant loss of housing units from the core of the development, the area can no longer clearly convey this separation of land uses during the historic period. The industrial area alone does not strongly convey this theme, and given the fact that industrial development was the last of the project's "other community objectives" rather than a primary goal, a portion of the project's industrial area alone does not convey the associations to adequately represent the overall project. Further, the Glenwood project was not the only project of the Minneapolis HRA which included industrial development. Some of these efforts, including the Seward South area (begun 1963), had industry as a major focus.

The fact that the Glenwood project was the first major renewal project undertaken by the Minneapolis HRA does not, by itself, make it significant under NRHP criteria. As the evaluation text indicates, the city's subsequent Gateway and Cedar Square West renewal projects garnered considerably more attention. Most important, given the substantially compromised historical integrity of the overall Glenwood Redevelopment Area, we conclude that neither the area as a whole, nor a portion of the industrial component, would convey the associations needed for potential National Register eligibility.

5. The remaining Phase I and Phase II properties in the Industrial Survey Zone do not meet NRHP criteria.

We will be submitting the evaluations of properties in the other Minneapolis survey zones as they become available.

Please submit comments on the SWT Minneapolis Industrial Survey Zone determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651 366 4292 with any questions or concerns.

Sincerely,

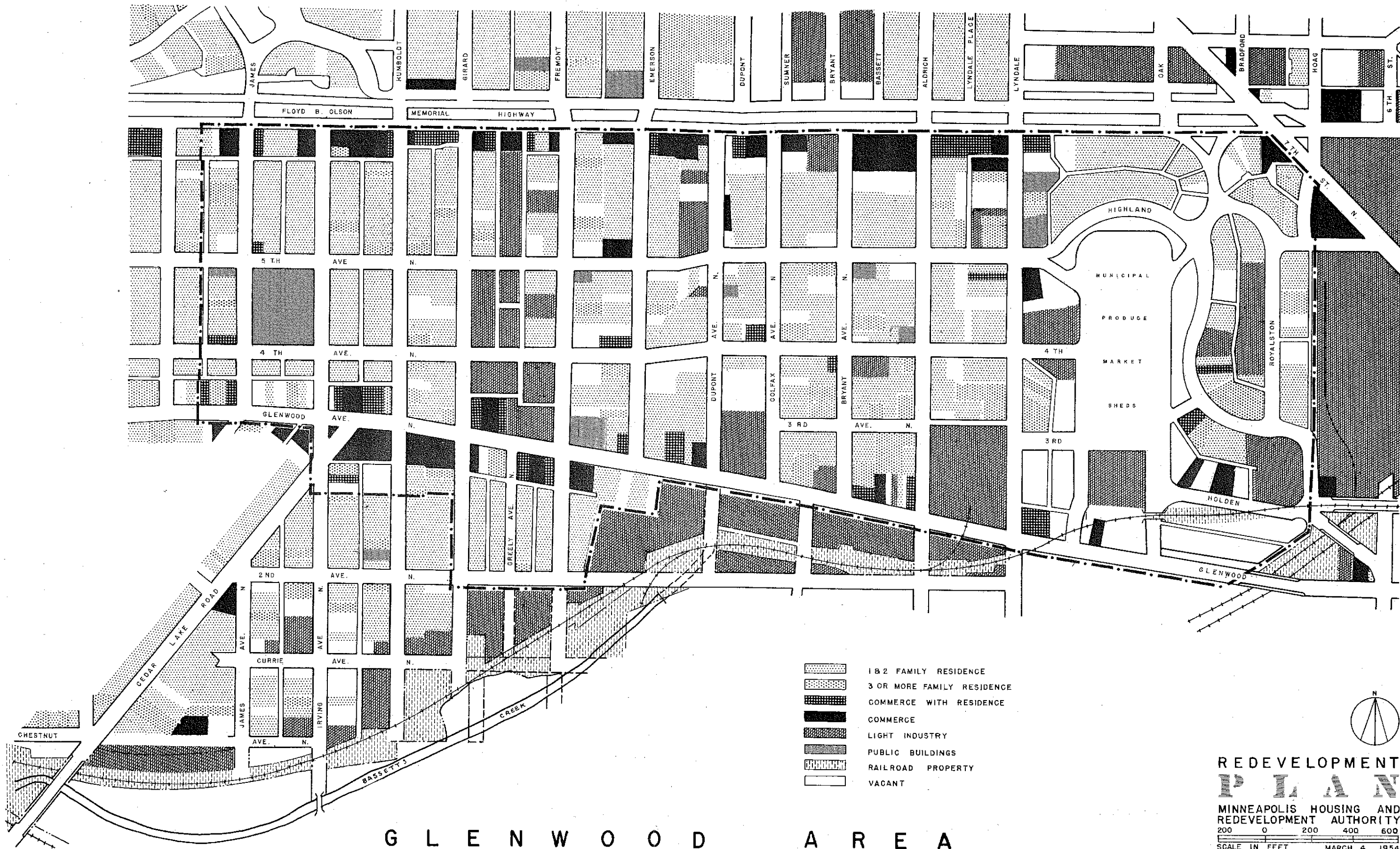


Dennis Gimmestad
Mn/DOT Cultural Resources Unit









cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Ed Hunter, Hennepin County
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Jack Byers, Minneapolis Heritage Preservation Commission
Mn/DOT CRU project file

enclosures

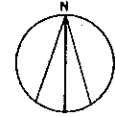
LAND USE



G L E N W O O D A R E A

-  1 & 2 FAMILY RESIDENCE
-  3 OR MORE FAMILY RESIDENCE
-  COMMERCE WITH RESIDENCE
-  COMMERCE
-  LIGHT INDUSTRY
-  PUBLIC BUILDINGS
-  RAILROAD PROPERTY
-  VACANT

N



REDEVELOPMENT PLAN

MINNEAPOLIS HOUSING AND REDEVELOPMENT AUTHORITY

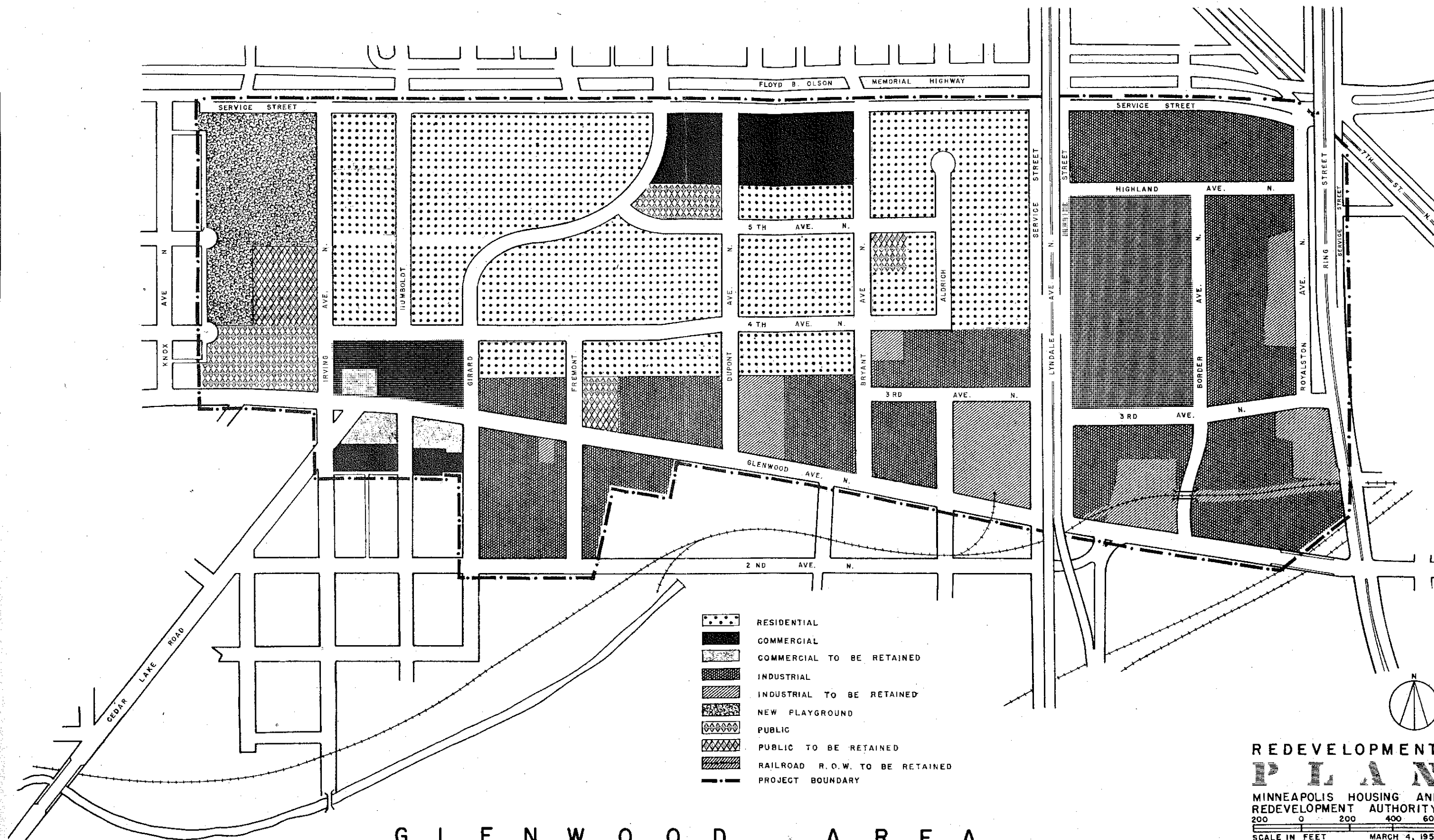
200 0 200 400 600

SCALE IN FEET MARCH 4, 1954

PROPOSED

LAND USE

MAP

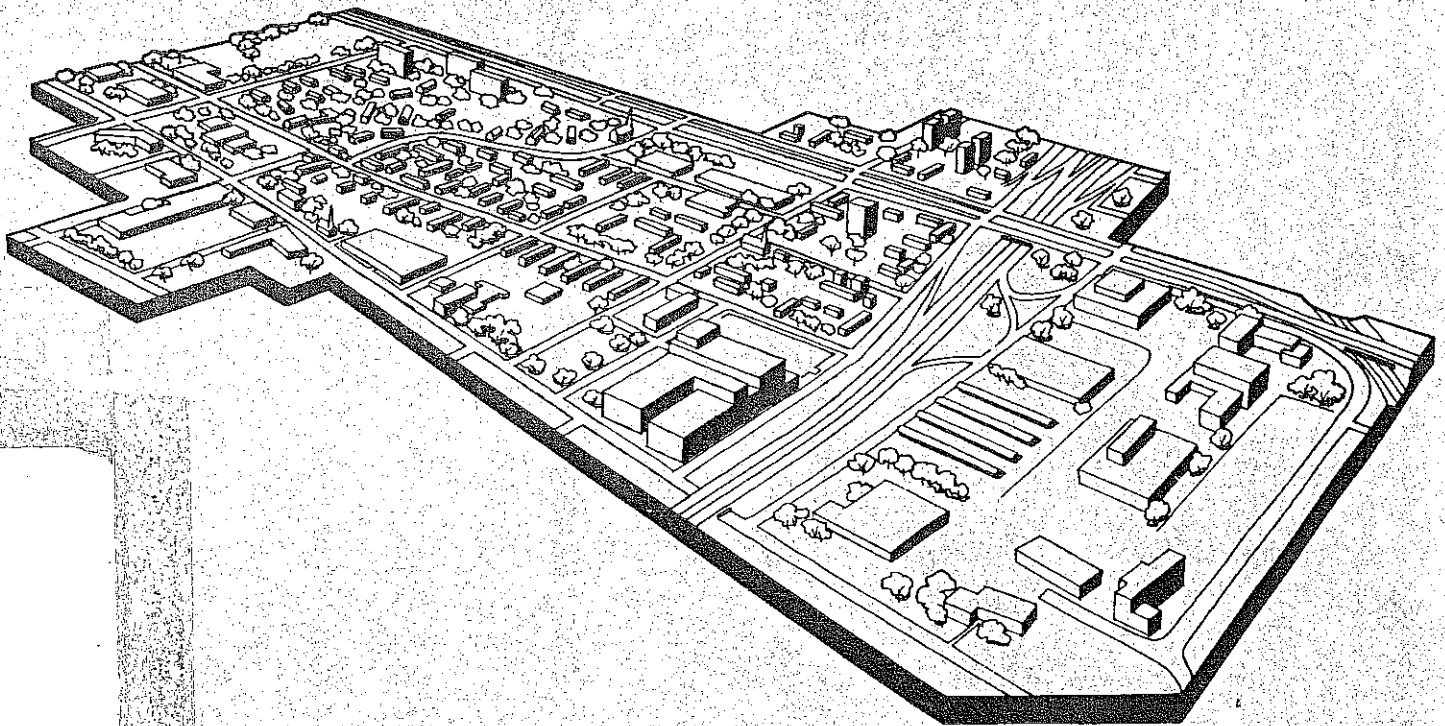


G L E N W O O D A R E A

**REDEVELOPMENT
P L A N**
 MINNEAPOLIS HOUSING AND
 REDEVELOPMENT AUTHORITY
 200 0 200 400 600
 SCALE IN FEET MARCH 4, 1954

GLENWOOD REDEVELOPMENT

MUNICIPAL REFERENCE LIBRARY
307 City Hall
Minneapolis, Minn. 55415



HOUSING AND REDEVELOPMENT AUTHORITY
IN AID FOR THE CITY OF MINNEAPOLIS
1214 Metropolitan Building
Minneapolis, Minnesota

GLENWOOD REDEVELOPMENT PLAN
AND URBAN RENEWAL PROJECT
MINN. R-1 REVISED JUNE 30, 1956
Including Amendments Nos. 1, 2, 3, and 4
Printed February 17, 1966



State Historic Preservation Office

May 20, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 2 – Downtown Survey Zone)

Dear Mr. Gimmestad:

Thank you for providing additional survey information for the above-referenced project. This letter reviews the survey research design (Appendix B) and the Downtown Zone portions of Volume Two, including both Sec. 4.3 of the project report, and the unbound inventory forms. The reports and inventory forms have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), the provisions of the Minnesota Historic Sites Act, and the SHPO History/Architecture Survey Guidelines.

We concur with the archaeological and architectural survey methods as presented, and in the Area of Potential Effect you have defined for this project.

With reference to the eligibility determinations you have sent to us, we concur that the following properties are **not eligible** for listing in the National Register of Historic Places: Happy Hour Bar and Café (HE-MPC-7959); Loring Park Development District (HE-MPC-16390); Orchestra Hall (HE-MPC-0459) and Lincoln Bank Building (HE-MPC-0437). Please note that today our office received a revised Part I Tax Credit Application for the Lincoln Bank Building that may include information that would cause us to re-evaluate our opinion on eligibility. We will advise you when further information is known.

We also concur that the following properties are **eligible**: Peavy Plaza (HE-MPC-3620), Loring Greenway (HE-MPC-0534), Minneapolis Film Exchange Historic District (HE-MPC-16980), First Baptist Church and Jackson Hall (HE-MPC-0432), Young-Quinlan Building (HE-MPC-2999), Dayton's Department Store (HE-MPC-5099), Murray's Restaurant and Cocktail Lounge (HE-MPC-0353), Gluek's Bar (HE-MPC-0350), and two Northern States Power Company properties (HE-MPC-0338) and (HE-MPC-0450).

For the considered eligible sites only, we are asking for a few changes in the inventory forms that you have submitted. Although some of the same problems exist in the report text, and on forms for non-eligible sites, in the interests of time and workload, we are not asking that these be changed. However, the file information for eligible sites needs to be complete, consistent and correct, insofar as possible.

Requested Revisions to Inventory Forms

Our survey guidelines require that the Architect or Engineer, when known, be listed as a separate item, not just inserted as part of the description. Similarly, the "style" of the structure, when known or applicable, needs to be called out separately. A reviewer shouldn't have to plow through pages of description to find these items. Please revise the forms for all eligible sites accordingly. Additional revision requests for individual properties are provided below.

Peavy Plaza

1. Add year built
2. The only photo on the inventory sheet shows a small part of the Plaza only, under thick snow cover. The report has much more illustrative photos. Please use a better photo.

Loring Greenway

1. Add year built
2. You have determined this to be individually eligible, and we concur. But the form is filled out as a contributing element only. Please revise status.
3. The description and eligibility sections reference the Loring Park Development District. The relevant sections of the District form need to be inserted on the greenway form, so they will be available for reference without pulling out other file materials.
4. The descriptive materials selected to insert should be focused on the landscape design aspects of the site that support the eligibility determination.

Minneapolis Film Exchange Historic District

1. Add a new form, or revise the form submitted for this proposed district. Right now there appears to be a significant error, because the survey form information for the Film Exchange district is incorrectly included on the form for 1011 Currie Ave. North.
2. Please add a map showing District boundaries. There is a map in the report, but none with the inventory form.
3. Please label the map, and add a key. It would also be helpful to show the freeway location on the same map, as the freeway has direct bearing on the setting, integrity and spatial limits of the district.

First Baptist Church and Jackson Hall

1. The form heading construction date is 1900, while the text says 1886. Please clarify.
2. A separate, labeled date for Jackson Hall should be added (1924)

Northern States Power (15 S. 5th Street)

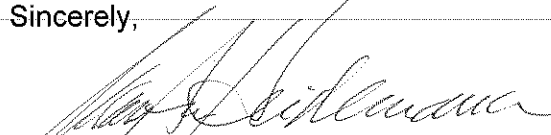
1. Please clarify construction date. The report shows photos from several stages of construction of the 3 story/5 story section of this building, beginning in 1903, but the inventory form shows 1916 as the year built.

2. Please clarify intended period of significance and rationale for same. The form as submitted has handwritten edits, and refers to a "re-facing" date not supported in the text and not clearly related to Criterion A.

Please send us the revisions and additions requested above. We look forward to working with you on the additional sections of the architectural survey, when they become available.

Give me a call if you have any further questions on this review.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission
Charlene Roise, Hess Roise and Company



State Historic Preservation Office

May 26, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 2 – Minneapolis Industrial Survey Zone)

Dear Mr. Gimmestad:

Thank you for providing the Minneapolis Industrial Survey Zone information for the above-referenced project, including the project report and the unbound inventory forms. These materials have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), the provisions of the Minnesota Historic Sites Act, and the SHPO History/Architecture Survey Guidelines.

With reference to the eligibility determinations you have sent to us, we concur that the Glenwood Redevelopment Area Industrial Zone Historic District is **not eligible** for listing in the National Register of Historic Places. With reference to this evaluation, it was very helpful to have the actual 1954 redevelopment plan and land use maps available to substantiate the plan goals, project area boundaries, and recommended land uses. These maps allowed us to better understand the scope of the total redevelopment project, and the subsequent loss of plan area integrity. Thank you for the supporting materials and for your careful analysis.

We also concur that the following properties **are eligible: Dunwoody Institute (HE-MPC-6641) and Regan Brothers Bakery (HE-MPC-16274)**. For both these properties, the consultant, Hess-Roise, has prepared a cogent and well-documented narrative that supports Register eligibility under Criterion A.

As with the prior submittal, and for the considered eligible sites only, we are asking that a few corrections and additions be made to the inventory forms that you have submitted (see below).

Requested Revisions to Inventory Forms

Dunwoody Institute

1. The narrative on the survey form has some format and editing problems. In the History section, text regarding vocational education, founding and growth, and "A Building of its Own" have been inadvertently repeated. Please edit this form to eliminate text repetition, while checking for any possible text omissions.
2. A map, diagram or site plan needs to accompany the inventory form that can clarify the intended boundaries of the eligible property, and also label the pertinent sections of the building(s). The report includes portions of both a Sanborn Map and an annotated Google earth aerial view. These items could be adapted for inclusion on the inventory form.

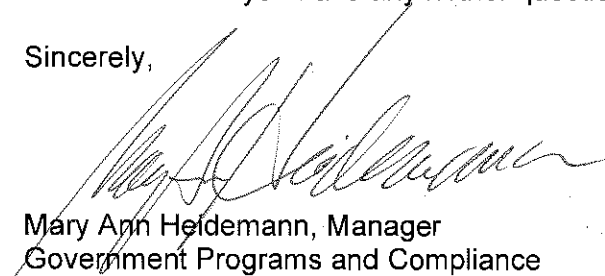
Regan Brothers Bakery

1. It would be helpful to add the dates of major building additions to the inventory heading, not just the date of construction of the initial section, since the additions are significant in their own right, and show building style changes spanning three quarters of a century.
2. A diagram of the building, labeling the various additions as described would be helpful.
3. Alternatively, additional or different labeled photos could be used to show more clearly the various building additions. The "corner shot" with the 1909 section does not well illustrate the original 1895 bakery, the much later 1-story garage addition, or the flour storage tower; all of which illustrate evolutions in the baking industry.

Please send us the inventory form revisions and additions as requested above. Meanwhile, we look forward to working with you on the additional sections of the architectural survey, as they become available.

Give me a call if you have any further questions on this review.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission
Charlene Roise, Hess Roise and Company



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

23 June 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota;
Architecture/History Investigations, Volumes One and Three (SHPO # 2009-0080)

Dear Dr. Heidemann:

On 20 January 2011, your office submitted comments on Volume One (suburban survey zones) and Volume Three (railroad survey zones) of the *Phase I/Phase II Architecture History Investigation for the Proposed Southwest Transitway Project, Hennepin County, Minnesota*.

Your letter concurred with our determinations of eligibility/non-eligibility on the surveyed properties. You also requested some additional information on several properties to better document the evaluations. This submittal responds to that request. Because the reports we submitted for your review are considered final, we are, in most cases, sending you “supplemental information” sheets that can be appended to the earlier material. However, in two cases (the inventory forms for the Hopkins District and the Volume Three survey report), we have prepared new documents that should *replace* the originals (these cases are noted below).

Volume One (Mead & Hunt Inc., September 2010; Eden Prairie, Minnetonka, Hopkins, and St. Louis Park survey zones)

1. **Hopkins City Hall (HE-HOC-026).** We agree with your comment about the applicable NRHP area of significance, and are submitting supplemental information specifying the National Register theme of Politics and Government, rather than Community Planning and Development.
2. **Hopkins Downtown Commercial Historic District (HE-HOC-027)**
 - A. We are submitting supplemental information on the extent of the historic core of downtown Hopkins during the period of significance and at the current time.

- B. Regarding the inventory forms for the properties in the district, we are submitting new revised forms *which should replace* the originally-submitted forms.
- i. These forms reflect the current name of the principal street in the district (“Mainstreet”). In addition, larger images and additional information on historic/current uses have been added.
 - ii. We are also submitting a revised and edited aerial view of the district (which appeared as figure 40 in the survey report) and a revised and edited listing of all properties in the district (which appeared as table 4 in the survey report). You will see from the individual inventory numbers in the revised listing that inventory forms for all properties were included in our initial transmittal. However, the locations of the forms in the inventory might have been confusing because the inventory numbers are not sequential.
 - iii. The form for 1007 Mainstreet is revised to indicate 1930s construction.
 - iv. The inventory form for 1014-16-20 Mainstreet is revised to non-contributing status. This building was constructed in the 1930s, the facades were renovated with brick and granite in the 1950s (during the period of significance), and the facades were renovated again with cedar shakes, copper canopies, and signage in 1971 (outside the period of significance). We note that much of the 1950s façade is visible, and more may be intact beneath the later work.
 - v. The principal address on the inventory form for the State Bank of Hopkins is 1004 Mainstreet, but the number 1002 also applies.
 - vi. The above material represents a total of 34 properties in the district (24 contributing and 10 non-contributing).
3. **Hoffman Callan Printing Company** (aka Motor Travel Services Building, HE-SLP-055). We are submitting supplemental information on the Wrightian style of this building as well on the original owner.

Volume Three (Summit Envirosolutions, October 2010; four railroad survey zones)

Because the issues with this report were limited to inaccurate inventory numbers, we have prepared a corrected report *which should replace* the report that was originally submitted. Please destroy the earlier version. No other copies of the earlier version have been distributed.

If you have any questions or concerns about the above material, please contact me.

Sincerely,



Dennis Gimmestad
Cultural Resources Unit

cc: Joe Hudak, Mn/DOT CRU
Mn/DOT CRU project file



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

24 June 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Evaluation of MacPhail School of Music and Cameron Transfer and Storage Building, Phase I/Phase II Architecture History Evaluations, Volume Two (SHPO # 2009-0080)

Dear Dr. Heidemann:

We are writing with regard to two properties which were recently evaluated as part of the Southwest Transitway survey. The properties are:

- The **MacPhail School of Music** (HE-MPC-5601), located at 1128 LaSalle Avenue in the Minneapolis Downtown Survey Zone. The evaluation of this property is found on pages 4.3-48 through 4.3-50 of Volume Two of the survey report, and on the inventory form.
- The **Cameron Transfer and Storage Building**, (HE-MPC-16391), located at 756 4th Street North in the Minneapolis Industrial Survey Zone. This property was only included in the survey at the Phase I level, so information is found only on the inventory form. (This property is also located in the area of potential effect for the Interchange project.)

Our evaluation of both of these buildings, based on the findings of the Southwest Transitway survey, was that they did not meet National Register criteria. You concurred in those determinations in your letters of 20 and 26 May 2011. We have now received additional information on both properties (copies enclosed). The information on each property, and our revised determinations, are as follows:

- The **MacPhail School of Music** Heritage Preservation Designation Study, prepared for the Minneapolis Heritage Preservation Commission by Carole Zellie, Landscape Research, January 2001. Based on this study, we conclude that this property meets National Register criterion A, in the area of Education.

- The **Cameron Transfer and Storage Building**, Historic Preservation Certification Application, Part 1 (2011). Based on this report, we conclude that this property meets National Register criterion C, in the area of Engineering.

Please review these revised determinations and provide us with your comments. We look forward to continuing to work with you as the planning process for this project proceeds.

Sincerely,

A handwritten signature in black ink that reads "Dennis Gimmestad". The signature is written in a cursive style with a large, stylized initial 'D'.

Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Ed Hunter, Hennepin County
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
John Smoley, Minneapolis Heritage Preservation Commission
Mn/DOT CRU project file



State Historic Preservation Office

July 22, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 1 & 3 *Revisions*)

Dear Mr. Gimmestad:

Thank you for providing the additional information we requested for the above-referenced project. We have reviewed the corrections, additions and modified interpretive approach presented in the revised materials. In particular, the new information on the Hopkins Downtown Commercial Historic District clarifies both the historic and current development context.

Your submittal completely satisfies the concerns we raised in our earlier letter. The revisions will be placed in our project and reference files.

My compliments to you for managing the large quantities of information generated in relation to this project. Your care and concern for detail is much appreciated.

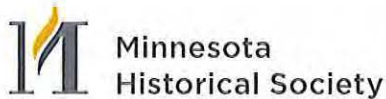
Give me a call if you have any further questions on this review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Ann Heidemann', written over a light blue horizontal line.

Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: John Smoley, Minneapolis Preservation & Design Team
Bill Wheeler, FTA



State Historic Preservation Office

July 22, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 2 – Downtown Survey Zone *Revisions*)

Dear Mr. Gimmestad:

Thank you for providing additional survey information for the above-referenced project. Specifically, we have reviewed the additional information regarding potential National Register eligibility for two sites in the downtown survey area:

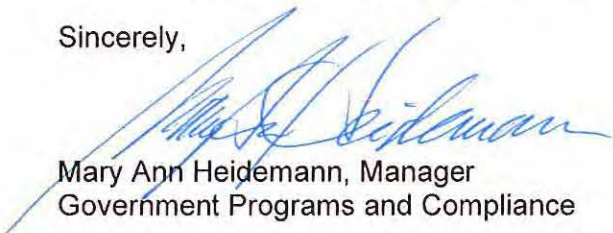
- The MacPhail School of Music (HE-MPC-5601)
- The Cameron Transfer and Storage Building (HE-MPC-16391)

We very much appreciate your willingness to re-evaluate the eligibility of these sites. **Based on the new information provided, we concur with your determination that both of the properties are eligible for listing in the National Register of Historic Places; MacPhail School of Music under Criterion A, and Cameron Transfer and Storage under Criterion C.**

For inclusion in our inventory files, we would appreciate receiving a revised, unbound inventory form for each of these properties.

Give me a call if you have any further questions on this review.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: John Smoley, Minneapolis Preservation & Design Team
Bill Wheeler, FTA



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

24 August 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55111

RE: Southwest Transitway project; inventory form revisions for properties in the Minneapolis downtown and Minneapolis industrial survey zones.

Dear Mary Ann:

On May 20, 2011, and May 26, 2011, you submitted comments to our office on the evaluation of properties in the downtown and industrial survey zones of the architecture/history survey of the Southwest Transitway project.

In those comments, you concurred with our determinations of National Register eligibility for ten properties (including one district) in the downtown zone, and for two properties in the industrial zone. You requested some changes on the inventory forms for those properties. In response to your request, we are now forwarding revised inventory forms to your office and to the Minneapolis Heritage Preservation Commission for the properties listed below. *Each revised form should replace the original form in its entirety.*

Downtown Zone

HE-MPC-3620 Peavey Plaza

HE-MPC-0534 Loring Greenway

HE-MPC-16980 Minneapolis Film Exchange Historic District

In addition to the above form for the district as a whole, revised forms are also submitted for the four contributing properties in this district:

HE-MPC-0421 Warner Brothers Picture Distribution

HE-MPC-0422 20th Century Fox Film Corporation

HE-MPC-16422 Universal Film Exchange

HE-MPC-0423 RKO Radio Building

HE-MPC-0432 First Baptist Church and Jackson Hall

HE-MPC-2999 Young Quinlan Building

HE-MPC-5099 Dayton's Department Store

HE-MPC-0353 Murray's Restaurant

HE-MPC-0350 Gluek Building

HE-MPC-0338 Northern States Power Company Building (Fifth Street)
HE-MPC-0450 Northern States Power Company Building (Nicollet)
HE-MPC-16421 Commercial building, 1011 Currie Avenue

This property is not one of the 10 downtown properties determined eligible. It is located adjacent to, but outside of, the Minneapolis Film Exchange District. The original form erroneously included information about the historic district. A corrected version is submitted.

Industrial Zone

HE-MPC-6641 William Hood Dunwoody Industrial Institute
HE-MPC-16274 Regan Brothers Bakery

We are also submitting revised narrative text for two sections of the Volume Two survey report. *Each revised section should replace the original section in its entirety.* The two sections are as follows:

Section 4.3.15, Minneapolis Film Exchange Historic District, report pages 4.3-70 – 4.3-75.

Section 4.3.28, Northern States Power Company Building (Fifth Street), report pages 4.3-134 – 4.3-141.

We appreciate your careful attention to the review of these properties, and look forward to consulting with you on the survey results for the remaining Southwest Transitway survey zones. Contact us at 651- 366-4292 with questions or concerns.

Sincerely,



Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Jack Byers, City of Minneapolis
Brian Schaffer, Minneapolis Heritage Preservation Commission
Mn/DOT CRU project file

enc: Revised inventory forms and report sections (to MnSHPO and MHPC only)



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

9 November 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II Architecture History Evaluations, Volume Two (part), Minneapolis West Residential Survey Zone (SHPO # 2009-0080)

Dear Dr. Heidemann:

This letter transmits the Minneapolis West Residential Survey Zone portions of Volume Two of the History/Architecture Investigations for the Southwest Transitway Project. This is the third of five survey zones within Minneapolis which are included in Volume Two. We previously submitted the Minneapolis Downtown Survey Zone and the Minneapolis Industrial Survey Zone for your review.

The transmittal includes Section 3.1 (Literature Search for the West Residential Survey Zone), Section 4.1 (Results for the West Residential Survey Zone), and a list of surveyed properties in the West Residential Survey Zone (part of Appendix A). These sections can be integrated into the Volume Two binder previously submitted. Please regard the materials on the West Residential Survey Zone as the final copy for those sections. Inventory forms for this zone are also included with this submittal.

With regard to historic properties in the West Residential Survey Zone, we have made the following determinations:

1. The following properties are listed in the National Register of Historic Places (NRHP):
 - A. **Frieda and Henry J. Neils House** (HE-MPC-6068), 2305 W. 21st St.
 - B. **Calhoun Beach Club** (HE-MPC-6126), 2730 W. Lake St.
2. The following properties have been previously evaluated as eligible to the NRHP, with SHPO concurrence:
 - A. **Grand Rounds Historic District**
 - B. **Lake of the Isles Residential Historic District**

3. The following properties meet NRHP criteria, based on the findings of this survey:
 - A. **The Minikahda Club** (HE-MPC-17102), (3205 Excelsior Boulevard), criterion C (landscape architecture, landmark period of golf course design). *In the absence of categories for landscape architecture classification in the NRHP Guidelines, the classification system developed by The Cultural Landscape Foundation at <http://tclf.org/landscapes/glossary> has been used.* The design of the oldest surviving golf course in Minneapolis (overall course dimensions and layout in 1898 and 1906, with an upgraded 1917 plan by noted golf architect Donald Ross) is a significant local landscape from the landmark period of golf course design and from the formative era of Ross's distinguished career. (Also see Bradley S. Klein, *Discovering Donald Ross: The Architect and His Golf Courses* [Chelsea, Michigan: Sleeping Bear Press, 2001], 106-112.)
 - B. **Calhoun Beach Apartments and Club** (HE-MPC-6125 and HE-MPC-6126), 2901-2905-2915 Dean Parkway and 2730 W. Lake Street, criterion A (social history). *The Calhoun Beach Apartments and the Calhoun Beach Club were built by Harry Goldie as part of a development begun in 1925 and completed in 1946. The Club was listed on the NRHP in 2003 under NRHP criterion C. The current evaluation considers the Apartments and the Club as a complex of buildings under NRHP criterion A.* Although Harry Goldie's Calhoun Beach project was not a financial success, it does represent a notable effort to establish an open residential, sports, and social facility in Minneapolis during a two decade period when the city was marked nationally for its anti-Semitism. (Also see Iric Nathanson, *Minneapolis in the Twentieth Century* [St. Paul: Minnesota Historical Society Press, 2010], 93-111.)
 - C. **Mac Martin House** (HE-MPC-8763), 1828 Mount Curve Ave., criterion B (commerce). *The historic name of the property should be the "Mac Martin House", because criterion B properties are generally named to reflect the person who is evaluated as significant under NRHP criteria.* Mac Martin, a significant force in the field of advertising, built this house at the mid-point of his five decade career.
 - D. **Lustron House** (HE-MPC-16728), 2423 Mount View Ave., criterion C (architecture).
4. The following properties are recommended as NRHP eligible in the survey report; it is our determination that they *do not* meet the criteria:
 - A. **The Parklake** (HE-MPC-16371), 3100-3128, 3134-3136, 3140-3144 W. Calhoun Blvd. and 3121 Excelsior Blvd., criterion C (architecture). This property was evaluated as an example of a garden apartment complex. A key characteristic feature of this property type is the

overall site plan, which typically places several detached buildings within a block, allows for sunlight and ventilation, and provides for landscaping. Of the three surviving local examples cited in the evaluation, Fair Oaks (3rd Ave. S. and 24th St. E., in Minneapolis) and Highland Village (Cleveland Ave. S., s. of Ford Pkwy., in St. Paul) have more extensively developed and characteristic site plans, whose greater symmetry provides a higher degree of cohesion. The Parklake is designed in the Moderne style, as opposed to the Colonial Revival style of Fair Oaks and Highland Village, but it does not appear that this style choice is particularly significant, especially considering that the Moderne style elements of The Parklake are not notably distinctive in and of themselves. We conclude that, while The Parklake is an example of a garden apartment complex, it is not NRHP eligible.

- B. **Xerxes Avenue Historic District** (HE-MPC-16667), criterion A (social history). The evaluation cites that the development of this two block segment of Xerxes Avenue during the period 1922 through c. 1940 was largely in the hands of John Nelson and members of the families of Louis and Samuel Fleisher. (Nelson employed the Fleishers as contractors for several of his initial buildings, and the Fleishers went on to become both developers and contractors for most of the later buildings.) The Fleishers themselves reflect the movement of the Jewish community from North Minneapolis to the suburbs, and the names of many (but by no means all) of the early Xerxes apartment occupants suggest Jewish/Eastern European-Russian descent, which may also reflect this pattern. However, the Fleishers were involved in apartment building construction over a wide area of the city, and there is no indication that residency on Xerxes Avenue by members of the Minneapolis Jewish community was particularly promoted or selected (as compared to other areas), or particularly long-lived. Lacking more specific evidence of the importance of these two blocks within the larger story of the Jewish community of the greater Minneapolis area, we conclude that this district does not meet NRHP criteria.
- C. **Miller Publishing Company Building** (HE-MPC-17019), 2501 Wayzata Blvd., criterion A (agriculture and communications). The evaluation cites that Miller Publishing began with the publication of the *Northwestern Miller* in 1873, was purchased by the American Broadcasting Company in 1978, and was merged with ABC's Farm Progress Publications in 1984. The property at 2501 Wayzata Blvd. was built in two sections in 1954 and 1967, and has associations with the final quarter of the company's independent existence. The evaluation provides an overview of farming in the mid-twentieth century, and cites examples of some of Miller's publications during the period, but there is no indication that the company's post-1954 contributions in agriculture or communications are particularly significant within the framework of NRHP criteria.

5. We have concluded that some properties within the West Residential Zone need additional study. These properties are included in the survey report and inventory, but we are not submitting determinations at this time.
 - A. **All properties with Kenwood Parkway addresses above 1800** (68 properties)
 - B. **Franklin-Kelly House** (HE-MPC-6766), 2405 W. 22nd St.
 - C. **Klein-Peterson House** (HE-MPC-6761), 2305 W. 21st St.
 - D. **Frank W. and Julia C. Shaw House** (HE-MPC-6603), 2036 Queen Ave. S.
 - E. **Commercial Building/Warehouse** (HE-MPC-16691), 1031 Madeira Ave.

After further study is complete, we will submit determinations on these properties for your review.

6. The remaining Phase I and Phase II properties in the SWT West Residential Survey Zone do not meet NRHP criteria.

We will be submitting the evaluations of properties in the other Minneapolis survey zones, as well as those mentioned under #5, above, as they become available.

Please submit comments on the West Residential Zone determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Lois Kimmelman, Federal Transit Administration
Maya Sarna, Federal Transit Administration
Katie Walker, Hennepin County
Kathryn O'Brien, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Joe Hudak, MnDOT Cultural Resources Unit
MnDOT CRU project file



State Historic Preservation Office

December 8, 2011

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 2 – Minneapolis West Residential Survey Zone)

Dear Mr. Gimmestad:

Thank you for providing the Minneapolis West Residential Survey Zone information for the above-referenced project, including the project report and the unbound inventory forms. These materials have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), the provisions of the Minnesota Historic Sites Act, and the SHPO History/Architecture Survey Guidelines.

With reference to the eligibility determinations you have sent to us, we concur that the Parklake (HE-MPC-16371), Xerxes Avenue Historic District (HE-MPC-16667) and Miller Publishing Company Building (HE-MPC-17019) are **not eligible** for listing in the National Register of Historic Places.

We also concur that the following properties are **eligible**: **The Minikahda Club (HE-MPC-17102), Calhoun Beach Apartments and Club (HE-MPC-6125 & 6126), the Mac Martin House (HE-MPB-8763) and the Lustron House.**

We understand that additional survey and evaluation work is in progress for specified Kenwood Parkway properties, the Franklin-Kelly House, the Klein-Peterson House, Shaw House and the warehouse at 1031 Madeira Avenue. We will be happy to consult with you further about these properties when additional information is available. We concur with your determination that the remaining properties surveyed in the West Residential Zone are **not eligible** for the National Register.

This submittal represents a massive amount of high-quality historical survey and evaluation work. Please convey our appreciation to all members of the project team.

Give me a call if you have any further questions on this review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Ann Heidemann', written over a light blue horizontal line.

Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission
Charlene Roise, Hess Roise and Company



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

10 February 2012

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II
Architecture History Evaluations, Volume Two (part), Minneapolis South
Residential/Commercial Survey Zone (SHPO # 2009-0080)

Dear Dr. Heidemann:

This letter transmits the Minneapolis South Residential/Commercial Survey Zone portions of Volume Two of the Architecture History Investigations for the Southwest Transitway Project. This is the fourth of five survey zones within Minneapolis which are included in Volume Two. We previously submitted the Minneapolis Downtown Survey Zone, the Minneapolis Industrial Survey Zone, and the Minneapolis West Residential Zone for your review.

The transmittal includes the following report sections pertaining to the South Residential/Commercial Survey Zone: Section 3.2 (Literature Search), Section 4.2 (Results), and a list of surveyed properties (part of Appendix A). These sections can be integrated into the Volume Two binder previously submitted. Please regard the materials on the South Residential/Commercial Survey Zone as the final copy for those sections. Inventory forms for the zone are also included with this submittal.

With regard to historic properties in the South Residential/Commercial Survey Zone, we have made the following determinations:

1. The following properties are listed in the National Register of Historic Places (NRHP):
 - A. **Walker Branch Library**, HE-MPC-6284, 2901 Hennepin Ave. S.
 - B. **Chicago Milwaukee & St. Paul Railroad Grade Separation Historic District**, HE-MPC-9959
 - C. **The Buzza Building**, HE-MPC-6324, 1006 W. Lake St. (listed on 24 January 2012)

- D. **Anne C. and Frank B. Semple House**, HE-MPC-6173, 100-104 W. Franklin Ave.
 - E. **George W. and Nancy B. Van Dusen House**, HE-MPC-6434, 1900 LaSalle Ave.
 - F. **Washburn Fair Oaks Mansion Historic District**, HE-MPC-4900
 - G. **Stevens Square Historic District**, HE-MPC-4965
 - H. **Abbott Hospital**, HE-MPC-4745, 110 E. 18th St.
2. The following properties have been previously evaluated as eligible to the NRHP, with SHPO concurrence:
- A. **Grand Rounds Historic District**, XX-PRK-001
 - B. **Lake of the Isles Residential Historic District**, HE-MPC-9860
 - C. **Lyndale Corners Historic District**, HE-MPC-7855
 - D. **The Carlton**, HE-MPC-5011, 2820 1st Ave. S.
 - E. **Despatch Laundry Building**, HE-MPC-4839, 2611 1st Ave. S.
 - F. **Washburn Fair Oaks Historic District**, HE-MPC-8362
3. The following properties meet NRHP criteria, based on the findings of this survey:
- A. **The Buzza Company Building** (HE-MPC-6324), 1006 West Lake Street, criterion A (industry, military). *During this survey's Phase II evaluation process, the Buzza property was nominated to the NRHP by the Minnesota SHPO. As indicated under #1, above, it has recently been listed.*
 - B. **Calvary Baptist Church** (HE-MPC-6027), 2608 Blaisdell Ave.S., criterion C (architecture). Calvary Baptist Church displays the distinctive characteristics of a recognized church design prototype from the late 19th century, which integrated an Akron Plan Sunday School with a diagonal-plan auditorium. This combination design was introduced in Minnesota by noted Minneapolis architect Warren Hayes. His 1888 design for Calvary was built in two phases, the Akron Plan Sunday School in 1889 and the auditorium in 1902 (following his plans, after his death). Together with other well-preserved examples of Hayes' work (including First Congregational of Minneapolis [1888], Central Presbyterian [1889] in St. Paul, and Wesley Methodist [1891] in Minneapolis), Calvary Baptist represents a distinctive type of church plan that embodied both educational and religious approaches. We conclude that the property meets criterion C and criteria consideration A. We do not feel that there is adequate basis to establish eligibility under criterion A.
 - C. **Rowhouses** (HE-MPC-16145), criterion C (historic district). Given the overall residential character of the immediately adjacent Washburn Fair Oaks Historic District (NRHP eligible), and the district's inclusion

of similar rowhouses nearby, we conclude that the property at 1-11 E. 25th St. can be considered eligible as a contributing element of the district.

- D. **First Christian Church** (HE-MPC-16981), 2300 Stevens Ave. S., criterion C (architecture). First Christian Church is a clear expression of the characteristics of the mid-century modernist style as applied to an ecclesiastical building, evidenced by its materials, volumes, and massing, and enhanced by its prominent open site across from Washburn Fair Oaks Park. We conclude that the church complex meets criterion C and criteria consideration A.

 - E. **Franklin Nicollet Liquor Store** (HE-MPC-16752), 2012 Nicollet Ave., criterion C (architecture). The evaluation discusses the delineation of the “Googie” style as a popular variant within the Modern movement. This building, particularly its ornamentation, siting, and signage, embodies the distinctive characteristics of the style, and we conclude that the property meets criterion C.

 - F. **Plymouth Congregational Church** (HE-MPC-6511), 1900 Nicollet Ave., criterion C (architecture). Growing out of the office of H.H. Richardson after his death in 1886, the nationally prominent Boston firm of Shepley Rutan and Coolidge (1886-1915) was known for commissions such as the Stanford University campus plan (with Frederick Law Olmsted) and Boston’s first skyscraper, the Ames Building. Their design for Plymouth Congregational is a rural English Gothic church from the Late Gothic Revival period. The quality of the materials and the overall integrated composition of the sanctuary, guild hall, and parish house make the building a locally outstanding example of the style and qualify it under criterion C and criteria consideration A. The evaluation also discusses the philanthropic and social activities of the congregation and recommends the property as eligible under criterion A. However, the discussion is largely limited to the activities of this congregation, and we conclude that additional development of a broader social history context would be needed to substantiate criterion A eligibility.
4. The following properties are recommended as NRHP eligible in the survey report; it is our determination that they *do not* meet the criteria:
- A. **The Mall Apartment Historic District** (HE-MPC-7854), criterion A (community planning and development), and criterion C (architecture). The evaluation documents the construction of a group of apartment buildings between 1914 and 1930 on a strip of land bounded by Hennepin Avenue, the mall/railroad, the Calhoun-Isles Channel, and Lagoon Avenue/Lake Street. It would appear that these buildings represent characteristic patterns of urban residential development,

responding to expected transportation, market, commercial, and recreational factors. However, there is no indication that the grouping was the result of an intentional design or planning effort, and considering the lack of stylistic distinction, we do not find that the district meets either criterion A or C.

- B. **Hardware Mutual Fire Insurance Company Building** (HE-MPC-6514), 2344 Nicollet Ave., criterion A (commerce). The evaluation indicates that Hardware Mutual was a long-standing insurance company which expanded the scope of its insurance offerings as well as the geographic range of its customers during the occupancy of its headquarters building at 2344 Nicollet Avenue from 1922 through 1956. However, there is insufficient basis to substantiate the importance of the company's activities within the insurance field and establish eligibility under criterion A.
- C. **Apartment Building** (HE-MPC-16304), 2312 Blaisdell Ave. S., criterion C (architecture). The evaluation includes a discussion of the context of apartment house construction in Minneapolis during the mid-20th century. However, there is insufficient basis to substantiate the importance of 2312 Blaisdell within this aspect of the development of the city's residential building stock.
- D. **Humboldt Institute** (HE-MPC-16299), 2201 Blaisdell Ave. S., criterion A (education). The evaluation cites that Humboldt Institute began as Humboldt College in Iowa in 1872, reorganized with a more vocational focus in 1895, and moved to Minneapolis in 1914. It was at several locations before constructing the building at 2210 Blaisdell in 1958-59. The school was purchased by Career Academy in 1969, and ceased operations in 1978. The evaluation provides an overview of vocational/technical education and the school's operations in the early to mid-20th century, but there is no indication that the Humboldt Institute's post-1959 contributions in education are particularly significant within the framework of NRHP criteria.
- E. **Minneapolis and Saint Louis Railway Company Main Office** (HE-MPC-16487), 111 Franklin Ave. E., criterion A (commerce). The evaluation cites that the M&StL Railway Company was established by Minneapolis business interests in 1870, operated under a receivership between 1923 and 1942, enjoyed a modest resurgence after World War II, and was acquired by the Chicago and Northwestern Railroad in 1960. The building at 111 Franklin was completed in 1951 during the company's final decade as an independent railroad. The evaluation provides an overview of the company's evolution, but there is no indication that its post-1951 activities are particularly significant within the framework of NRHP criteria.

5. The remaining Phase I and Phase II properties in the SWT South Residential/Commercial Survey Zone do not meet NRHP criteria.

We will be submitting the remaining sections of Volume Two of the Southwest Transitway survey report as they become available.

We also note that the scope of this federal project review has been expanded to include alternatives for freight rail relocation or co-location. We are in the process of initiating surveys for these areas, incorporating an Area of Potential Effect similar to that employed in the original survey research design. The additional survey will include areas within the St. Louis Park Survey Zone (in Volume One) and in the Minneapolis West Residential Survey Zone (in Volume Two).

Please submit comments on the South Residential/Commercial Survey Zone determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Lois Kimmelman, Federal Transit Administration
Katie Walker, Hennepin County
Kathryn O'Brien, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Teresa Martin, MnDOT Cultural Resources Unit
MnDOT CRU project file



State Historic Preservation Office

March 9, 2012

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
395 John Ireland Boulevard, MS620
St. Paul, MN 55155

Re: Southwest Transitway Project in Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & Downtown Minneapolis, Hennepin County
SHPO Number: 2009-0080 (Vol. 2 – Minneapolis South Residential/Commercial Survey Zone)

Dear Mr. Gimmestad:

Thank you for providing the Minneapolis South Residential/Commercial Survey Zone information for the above-referenced project, including the project report and the unbound inventory forms. These materials have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), the provisions of the Minnesota Historic Sites Act, and the SHPO History/Architecture Survey Guidelines.

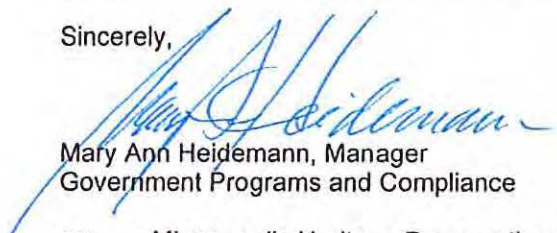
We acknowledge that a number of properties within this portion of the project's Area of Potential Effect are already listed in or eligible for listing in the National Register of Historic Places. I will not repeat the prior listed or determined eligible properties, other than thanking you for taking them into consideration.

With reference to the new eligibility determinations you sent, based on our review of the Phase I and Phase II survey reports submitted, as well as your own eligibility comments and findings, we concur that the following properties are eligible for listing in the National Register: **Calvary Baptist Church (HE-MPC-6027), the Rowhouses at 1-11E. 25th Street (HE-MPC-16145)** [as contributing resources within the recommended expanded bounds of the Washburn Fair Oaks Historic District], **First Christian Church (HE-MPB-16981), Franklin Nicollet Liquor Store (HE-MPC-16752) and Plymouth Congregational Church (HE-MPC-6511).**

We also concur with your determination that the Mall Apartment Historic District (HE-MPC-7854), the Hardware Mutual Fire Insurance Company Building (HE-MPC-6514), the Apartment Building at 2312 Blaisdell Ave. S. (HE-MPC-16304), Humboldt Institute (HE-MPC-16299), and the Minneapolis and St. Louis Railway Company Main Office (HE-MPC-16487) are **not eligible** for listing in the National Register of Historic Places; and that the remaining properties surveyed in the Minneapolis South Residential/Commercial Survey Zone are also **not eligible** for the National Register.

As before, I note that this portion of the survey submittal represents a massive amount of high-quality historical resource identification and evaluation work. Please convey our appreciation to the project team.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Minneapolis Heritage Preservation Commission
Charlene Roise, Hess Roise and Company



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

20 March 2012

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II
Architecture History Evaluations, Volume Two (part), (SHPO # 2009-0080)

Dear Dr. Heidemann:

This letter transmits the remaining sections of Volume Two of the Architecture History Investigations for the Southwest Transitway Project. We previously submitted the Minneapolis Downtown Survey Zone, the Minneapolis Industrial Survey Zone, the Minneapolis West Residential Zone, and the Minneapolis South Residential/Commercial Zone for your review.

This transmittal includes the following report sections:

- Title page (and report cover)
- Management Summary
- Table of Contents (including tab)
- 1.0 Introduction
- 2.0 Methods and Research Design
- 3.5 Minneapolis Warehouse Survey Zone
- 4.5 Minneapolis Warehouse Survey Zone
- 5.0 Recommendations
- Bibliography
- Appendix A – Research Design
- Appendix B – Tables of Surveyed Properties

Note that the Appendix A (Research Design) and Appendix B (Tables) for Volume Two were reversed in our previous submittals. The above reflects the order in Volumes One and Three of the survey report.

This transmittal includes information on the fifth and final survey zone (Minneapolis Warehouse) in Volume Two. This zone is comprised of portions of the Minneapolis Warehouse Historic District and the St. Anthony Falls Historic District. Both of these districts are already listed in the National Register, and no additional Phase I or Phase II survey work was undertaken in this survey zone.

We will be submitting a report of supplemental architecture/history survey work in four zones (St. Louis Park Zone [Vol. One], Minneapolis West Residential Zone [Vol. 2], Minneapolis, Northfield and Southern Railroad Zone [Vol. 3], and Great Northern Railroad Zone [Vol. 3]) when complete. This supplemental work comprises the area of the proposed freight rail relocation, which was added to the scope of the federal undertaking in 2011. Other survey work remaining for the Southwest project includes the Phase I/II archaeology survey and some additional evaluation work on several architecture/history properties in the Minneapolis West Residential Survey Zone.

Because this submittal does not include any property evaluations, we are not specifically requesting comments. Of course, if you have any questions or concerns about any of the submitted material, please let us know.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Katie Grasty, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Chris Weyer, Metropolitan Council
Kathryn O'Brien, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission (w/ enc.)
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
MnDOT CRU project file



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

8 May 2012

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II
Architecture History Evaluations, Volume Four; supplemental survey work in St.
Louis Park and Minneapolis, SHPO #2009-0080

Dear Dr. Heidemann:

We are continuing consultation regarding the identification of architecture/history
historic properties for the Southwest Light Rail Transit project.

As indicated in our letter of 10 February 2012, the scope of the federal review of this
project was amended in 2011 to address future alternatives for the freight rail traffic
which currently runs along a portion of Segments 4 and A of the project area. Two
alternatives are being considered: 1) co-locating the freight rail with the light rail
along portions of Segments 4 and A, or 2) rerouting the freight rail on existing tracks
through St. Louis Park and Minneapolis. The area of the potential co-location was
included in the area of potential effect (APE) for the initial architecture-history survey
of the project, but the area of the potential reroute was not. This letter transmits a
supplemental architecture/history survey report and inventory forms for the area of the
potential reroute.

The APE for the reroute corridor (Segment FR) follows the same parameters
established in the overall research design for the project survey (included in Appendix
A). This APE lies within previously unsurveyed portions of four of the original survey
zones. The zones are: St. Louis Park Survey Zone (Volume One), Minneapolis West
Residential Survey Zone (Volume Two), Minneapolis Northfield and Southern RR
Survey Zone (Volume Three) and Great Northern RR Survey Zone (Volume Three).
The survey report of the reroute corridor is organized along these four zones.

Based on the findings of this survey, we have made the following determinations:

1. St. Louis Park Survey Zone. The following property meets National Register of Historic Places (NRHP) criteria:
 - A. **Helen and Paul Olfelt House**, HE-SLC-0010, 2206 Parklands Lane
2. Minneapolis West Residential Survey Zone. The following properties meet NRHP criteria:
 - A. **Grand Rounds Historic District**, XX-PRK-001 (previous evaluation)
 - B. **Prudential Insurance Company of American, North Central Home Office**, HE-MPC-6643, 3701 Wayzata Blvd.
3. Great Northern Survey Zone. The following property meets NRHP criteria:
 - A. **Great Northern Railroad Corridor**, HE-SLC-1092 (this determination pertains to the section of the corridor in St. Louis Park; the section in Minneapolis was determined eligible in Volume Three).
4. The remaining Phase I and Phase II properties in the survey of the freight rail reroute corridor (Volume Four) do not meet NRHP criteria.

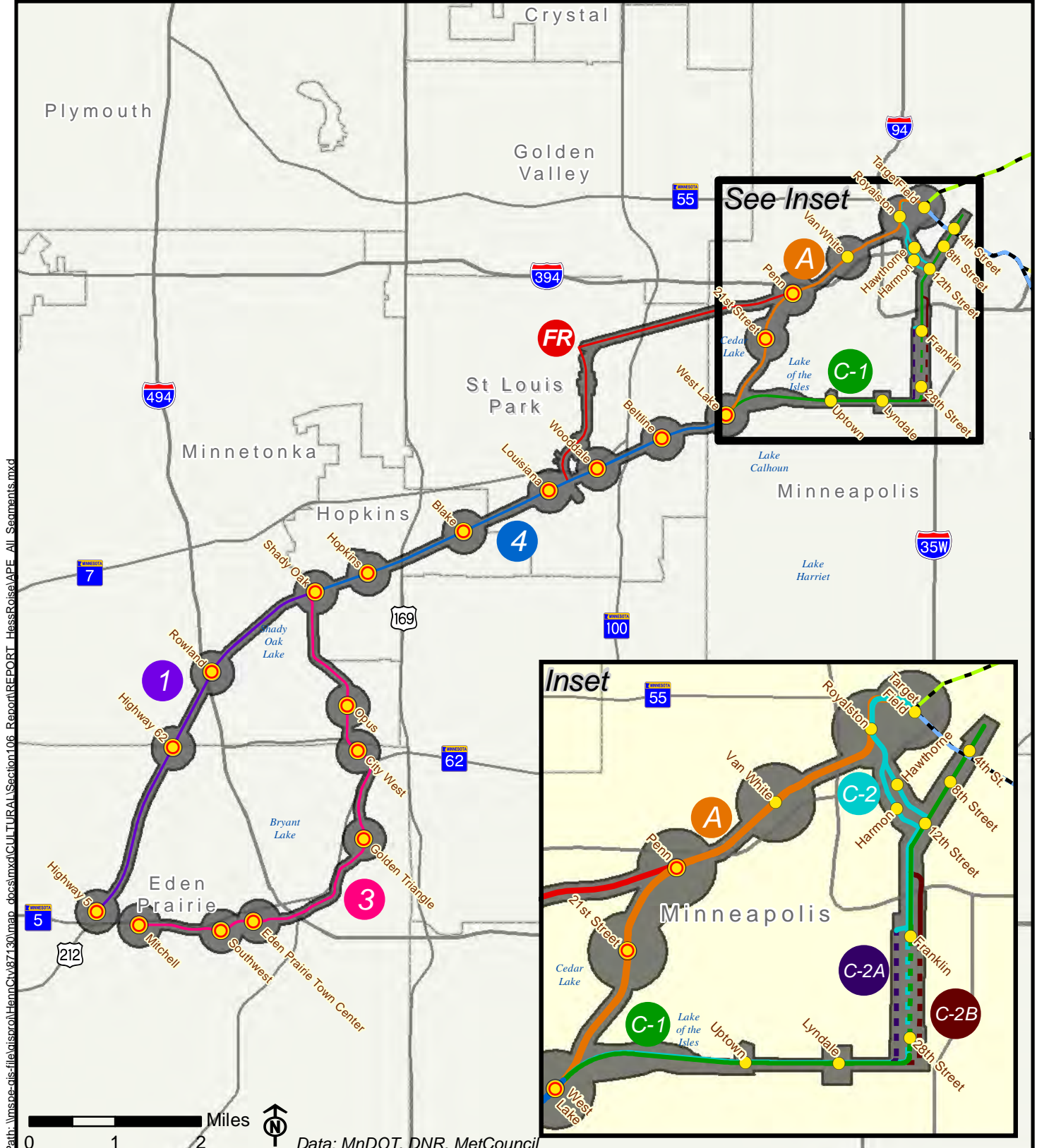
Please submit comments on the above determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Katie Grasty, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Kathryn O'Brien, Metropolitan Council
Nani Jacobson, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic Development
Brian Schaffer, Minneapolis Heritage Preservation Commission (w/enc.)
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal and Adam Fulton, City of St. Louis Park (w/enc.)
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie



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Data: MnDOT, DNR, MetCouncil

Legend	
Area of Potential Effect	Segment C-1 (Nicollet Mall)
Segment FR	At-Grade, 12th Street; At-Grade, 11th Street
Segment 1	Segment C-1 Tunnel
Segment 3	Segment C-2 Tunnel
Segment 4	Segment C-2A Tunnel (Blaisdell Avenue)
Segment A	Segment C-2B (1st Avenue)
	Segment C-2B Tunnel
Station	Park & Ride Station
	Northstar Commuter Rail
	Hiawatha Light Rail

Area of Potential Effect



State Historic Preservation Office

June 6, 2012

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Vol. 4 – Supplemental Report #1)

Dear Mr. Gimmestad:

Thank you for providing the Vol. 4 Supplemental Report No. 1 and associated inventory sheets for the above-referenced project. These materials have been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), the provisions of the Minnesota Historic Sites Act, and the SHPO History/Architecture Survey Guidelines.

With reference to the eligibility determinations you have sent to us, we concur that the following properties are eligible for listing in the National Register of Historic Places:

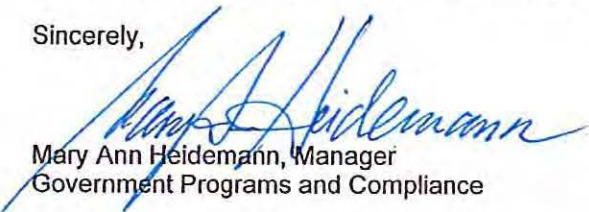
- Helen and Paul Olfelt House (HE-SLC-0010), Parkland Lane
- Prudential Insurance Company of America, North Central Home Office (HE-MPC-6643), 3701 Wayzata Boulevard
- Great Northern Railroad Corridor, St. Louis Park Segment (HE-SLC-1092)

A portion of the Grand Rounds Historic District also exists in this part of the study area. As you correctly noted, the Grand Rounds was previously determined to be Register-eligible.

We further concur that all the other properties surveyed in this part of the project are not eligible for listing in the National Register.

Thanks for the thorough and high quality work. Give me a call if you have any questions on this review.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Hilary Dvorak, Minneapolis Heritage Preservation Commission
Heather Goodson, Mead and Hunt



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

29 June 2012

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase 1a
Archaeological Investigation for the Freight Rail Relocation Corridor in St. Louis Park
and Minneapolis (SHPO # 2009-0080)

Dear Dr. Heidemann:

We are writing to continue consultation on the above referenced project.

On May 8, 2012, we informed you of an expansion of the scope of the federal review of this project to include future alternatives for freight rail traffic which currently runs along a portion of two of the potential light rail segments. That letter transmitted the report of a supplemental architecture/history survey of the freight rail relocation segment, along with our determinations of eligibility. Thank you for your comments.

This letter transmits a report of the supplemental phase 1a archaeological investigation of the freight rail relocation segment. This report supplements the *Phase 1A Archaeological Investigation for the Proposed Southwest Corridor Transitway Project, Hennepin County, Minnesota* (September 2010), which was transmitted to you on September 28, 2010.

The report recommends three areas for archaeological investigation along the freight rail relocation segment. In addition, two areas identified in the original phase 1a report, both located where the freight rail relocation segment overlaps an original light rail segment, are affirmed.

We concur with the recommendations of the supplemental report. These areas are being added to the scope of the phase I archaeological survey of the project.

For orientation, attached to this letter is an overview map of the project, with the freight rail relocation segment in red. Keep in mind that the Area of Potential Effect (APE) shown on this map is the overall project APE, which includes architecture history resources. The archaeological APE is smaller, and is defined in the phase 1a reports and in the survey research design.

To facilitate timely consideration of any comments you may have on this supplemental phase 1a report, please copy Liz Abel in the MnDOT Cultural Resources Unit on your response.

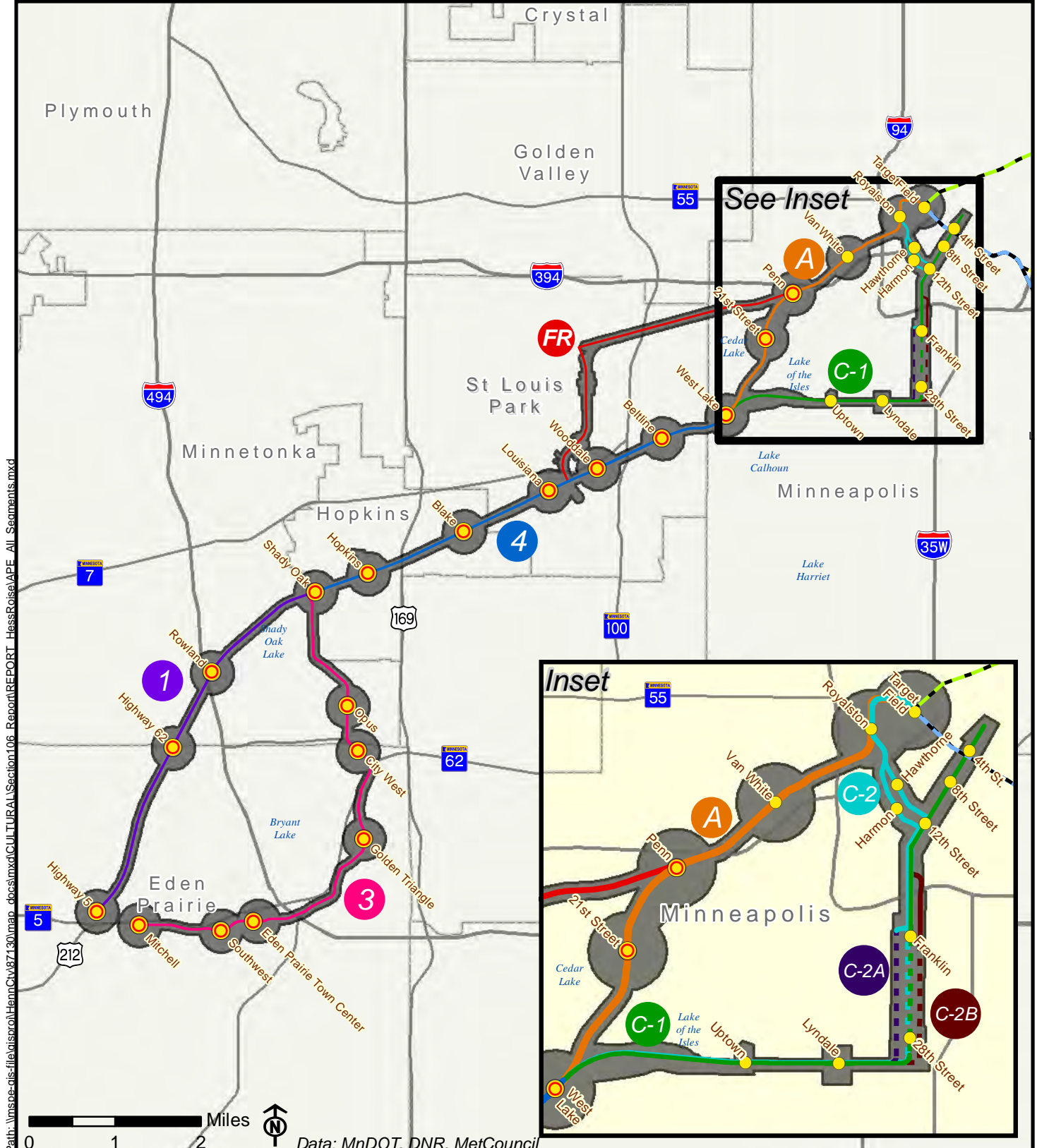
We look forward to continuing consultation with you on this project.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Katie Grasty, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Kathryn O'Brien, Metropolitan Council
Nani Jacobson, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission (w/enc.)
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal and Adam Fulton, City of St. Louis Park (w/enc.)
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Liz Abel, MnDOT Cultural Resources



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Legend	
Area of Potential Effect	Segment C-1 (Nicollet Mall)
Segment FR	At-Grade, 12th Street; At-Grade, 11th Street
Segment 1	Segment C-1 Tunnel
Segment 3	Segment C-2 Tunnel
Segment 4	Segment C-2A Tunnel (Blaisdell Avenue)
Segment A	Segment C-2B (1st Avenue)
Station	Segment C-2B Tunnel
Park & Ride Station	
Northstar Commuter Rail	
Hiawatha Light Rail	

Area of Potential Effect



Minnesota
Historical Society

State Historic Preservation Office

July 27, 2012



Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project: Phase 1a Archaeological Investigation for the Freight
Rail Relocation Corridor in Saint Louis Park
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for providing the supplemental Phase 1A archaeological assessment for the freight rail relocation corridor proposed as part of the above-referenced project. The supplemental information has been reviewed under Section 106 of the National Historic Preservation Act (36CFR800), and the provisions of the Minnesota Historic Sites Act.

The Phase 1A archaeological assessment supplemental report was prepared by Christina Harrison and Michael Madson (June 25, 2012). We concur with the findings of this supplemental Phase 1A report. We agree that the recommendations made for Phase 1 survey areas are appropriate, and we look forward to seeing results from the proposed survey.

Please contact David Mather of our office at 651-259-3454 if you have questions on this review.

Sincerely,


Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Hilary Dvorak, Minneapolis Heritage Preservation Commission
Scott Kipp, Eden Prairie Heritage Preservation Commission
Elizabeth Abel, MnDOT Cultural Resources Unit



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

17 January 2013

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase I
Archaeological Investigation (SHPO File #2009-0080)

Dear Dr. Heidemann:

This letter transmits the report of the phase I archaeological survey of this project. The survey was based on two phase 1A investigations. The first, *Phase 1A Archaeological Investigation for the Proposed Southwest Corridor Transitway Project, Hennepin County, Minnesota* (September, 2010), was submitted to you on 28 September 2010. The second, *Phase 1a Archaeological Investigation of the Freight Rail Relocation Corridor for the Southwest Corridor Transitway Project, Hennepin County, Minnesota* (June 2012), was submitted to you on 29 June 2012. Together, these reports contained archaeological assessments and survey recommendations for all six project segments (1, 3, 4, A, C, and FRR) included in the Draft Environmental Impact Statement. We appreciate your responses on those two reports.

A phase I archaeological survey has now been completed for the four project segments included in the locally preferred alternative (segments 3, 4, A, and FRR). The two Phase 1A reports recommended field investigation for a total of 44 areas in these four segments. Four areas were eliminated because they were outside the area of potential effect or were disturbed by modern construction. The investigations of the remaining 40 are included in the phase I report.

The report recommends eight areas for phase II survey. These include:

- **Area 3:k -- Highway 62 Overlook Site (21HE0410)**, in Eden Prairie (precontact; historic component not significant)
- **Area 4:e – Brookview Terrace Site (21HE0413)**, in St. Louis Park (precontact)
- **Area A:b – Site (21HE0412)**, in Minneapolis (multicomponent)
- **Area A:e -- Kenwood Station Site (21HE414)**, in Minneapolis (historic)

- **Area A:f – Cedar Lake Ice Company Site (21HE0409)**, in Minneapolis (historic)
- **Area A:h – M&StL Cedar Lake Yards Site (21HE0408)**, in Minneapolis (historic)
- **Area A:j – Oak Lake/Royalston Avenue**, in Minneapolis (historic)
- **Area FRR:b – StP&P Railroad Grade Site**, in St. Louis Park (historic)

The first of the above areas, 3:k (21HE0410) is located at the edge of the project APE, a considerable distance from any project-related work. It will not be affected by the project, and will not be included in the phase II survey. We are currently initiating a phase II survey of the other seven areas, anticipated for the summer of 2013.

Please submit comments on the phase I survey report within 30 days of this letter. Do not hesitate to contact me if you have any questions during your review. We look forward to continuing to work with you as planning for this project proceeds.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc (via email):

- Bill Wheeler, Federal Transit Administration
- Maya Sarna, Federal Transit Administration
- Nani Jacobson, Metro Transit
- Tom Hillstrom, Metro Transit
- Kathryn O'Brien, Metropolitan Council
- Jack Byers, Minneapolis Community Planning and Economic Development
- Brian Schaffer, Minneapolis Community Planning and Economic Development
- Jennifer Ringold, Minneapolis Park and Recreation Board
- Jeanette Colby, Kenwood Isles Area Association
- Meg McMonigal, City of St. Louis Park
- Nancy Anderson, City of Hopkins
- Elise Durbin, City of Minnetonka
- Regina Rojas, City of Eden Prairie



State Historic Preservation Office

February 14, 2013

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Phase I Archaeology Report for Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for providing the Phase I Archaeology Report dated December 2012, prepared for the above-referenced project by SWCA Environmental Consultants, to cover the locally preferred route alternative. We previously reviewed two Phase IA reports, in 2010 and 2012. Those investigations formed the basis of the Phase I archaeological survey presented in the December 2012 report.

It is difficult to review this report, because the maps and photographs are not included. They are listed in the Table of Contents as Appendices A-E, but they are not in the report we received. Instead, there is a page at the back that says: "Appendices A through E – Due to the sensitive nature of the information provided in the appendices, these maps will not be provided except by request to the Metropolitan Council." We need to have these materials to complete our review.

On the basis of the text, it appears that the Phase I archaeological survey was thorough. Forty areas identified in the Phase IA investigations were surveyed. Four other areas were found to be outside the APE, or too disturbed to warrant survey. A total of eight archaeological sites were identified, and recommended by the consultant for Phase II evaluation. Mn/DOT is currently planning Phase II studies for seven of these sites. **We agree that this is appropriate.**

The report states that a Phase II evaluation will not be performed on one of the sites identified in area 3:k (21HE0410), because it is located at the edge of the APE, and will thus not be affected by the project. We will need to see the maps, photographs, and construction drawings to determine whether we agree. If a Phase II evaluation will not be conducted at this site, protective fencing or other measures should be depicted in the construction plans. If protective fencing will not be provided, the site should be evaluated or the APE revised.

We look forward to receiving the missing information and site documentation. Meanwhile, please call David Mather at 651-259-3454 if you have any further questions on this review.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mary Ann Heidemann'.

Mary Ann Heidemann, Manager
Government Programs and Compliance



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

15 February 2013

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase I
Archaeological Investigation (SHPO File #2009-0080)

Dear Dr. Heidemann:

Thank you for your letter of 14 February 2013 regarding the phase I archaeological report for the above referenced project, indicating your concurrence with our upcoming Phase II investigation.

In response to your comments:

1. The report appendices, which were inadvertently left out of our earlier transmittal, are enclosed. We apologize for this omission.
2. With regard your questions on area 3:k in Eden Prairie, the following materials are enclosed:
 - A. A map of a portion of Segment 3 from the September 2010 archaeology 1A report, showing area 3:k.
 - B. A map of area 3:k found on page B-9 of the appendices to the December 2012 archaeology phase I report.
 - C. A copy of the conceptual design plans for this portion of the project.

The plans call for the City West station to be located on the southwest side of Highway 62. The identified archaeological site is located on the northeast side of Highway 62. After leaving the City West station, the LRT route does cross Highway 62 to the northwest, but at some distance from the archaeological site. In effect, the portion of the radius around the City West station northeast of Highway 62 can be considered outside the project area of potential effect.

Please let me know if you have any questions or concerns regarding area 3:k or the material in the survey report appendices. We look forward to continuing to work with you as the review of this project proceeds.

Sincerely,

A handwritten signature in black ink that reads "Dennis Gimmestad". The signature is written in a cursive style with a large, prominent 'G'.

Dennis Gimmestad
MnDOT Cultural Resources Unit

cc (via email):

Bill Wheeler, Federal Transit Administration
Maya Sarna, Federal Transit Administration
Nani Jacobson, Metro Transit
Tom Hillstrom, Metro Transit
Kathryn O'Brien, Metropolitan Council
Jack Byers, Minneapolis Community Planning and Economic Development
Brian Schaffer, Minneapolis Community Planning and Economic Development
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie



Three Rivers
PARK DISTRICT

**Three Rivers
Park District
Board of
Commissioners**

March 8, 2013

Penny Steele
District 1

Dennis Gimmestad
Minnesota Dept. of Transportation
Cultural Resources Unit
395 John Ireland Blvd
St. Paul, MN 55155-1899

Jennifer DeJournett
District 2

Dear Mr. Gimmestad,

Daniel Freeman,
Vice Chair
District 3

Please receive this letter as my official request that Three Rivers Park District – a unit of local government – be added to the list of consulting parties for the proposed Southwest Transitway Project (Southwest LRT) in matters pertaining to review and compliance with Section 106 of the National Historic Preservation Act.

John Gunyou,
Chair
District 4

Through a lease agreement with the Hennepin County Regional Railroad Authority (HCRRA), Three Rivers Park District operates two multi-use recreational trails over long segments of the historic rail corridor in question. Combined, the Cedar Lake LRT Regional Trail, and the Minnesota River Bluffs LRT Regional Trail serve over 800,000 visitors annually. In addition, Three Rivers Park District has an operating stake in The Depot Coffee House, situated within the historic Minneapolis & St. Louis Railway Depot (c.1902) located at 9451 Excelsior Boulevard. As such, Three Rivers Park District asserts that it has a demonstrated interest the Southwest Transitway Project, and its effects on the cultural resources located within the APE.

Larry Blackstad
Appointed
At Large

If you have any questions, or if I can be of further assistance in providing materials to support this request, please contact me at (763) 694-2059, or via e-mail to bwalker@threeriversparkdistrict.org. I look forward to hearing from you in response to this request.

Vacant
Appointed
At Large

Sincerely,



Cris Gears
Superintendent

Bill Walker,
Cultural Resources Program Coordinator
Three Rivers Park District

State Historic Preservation Office

March 12, 2013

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Phase I Archaeology Report for the Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

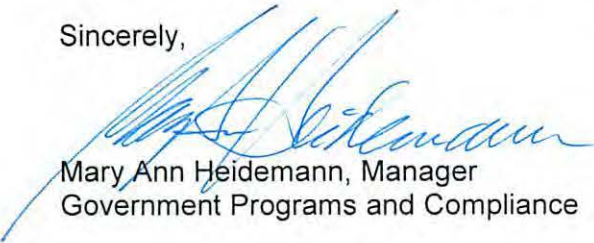
Dear Mr. Gimmestad:

Thank you for providing the missing maps and appendices prepared for the above-referenced project by SWCA Environmental Consultants, to cover the locally preferred route alternative. We previously reviewed two Phase IA reports, in 2010 and 2012. Those investigations formed the basis of the Phase I archaeological survey presented in the December 2012 report.

Based on the supplemental information provided, we now can understand and agree with the report, which states that a Phase II evaluation will not be performed on one of the sites identified in area 3:k (21HE0410), because it is located at the edge of the APE, and will thus not be affected by the project. In fact, we now see that the sites of concern are located on the opposite side of TH 62, and therefore will not be affected. We agree that protective fencing will not be required, based on site location.

Please call David Mather at 651-259-3454 if you have any further questions on this review.

Sincerely,


Mary Ann Heidemann, Manager
Government Programs and Compliance

Gimmestad, Dennis (DOT)

From: MaryAnn Heidemann <maryann.heidemann@mnhs.org>
Sent: Thursday, March 21, 2013 4:21 PM
To: Gimmestad, Dennis (DOT)
Cc: Kelly Gragg-Johnson
Subject: Fwd: Southwest LRT - consulting party request from Three Rivers Parks
Attachments: SWTconsultrequest3riversparks.pdf

Dennis:

We fully concur and support accepting the Three Rivers Park District as a consulting party on the Southwest LRT project. By copy of this memo and the attached letter from the Park District, I will ask Kelly to put this in our project file.

Please let FTA know of our support and concurrence.

Thanks,

Mary Ann

--

Mary Ann Heidemann, Manager
Government Programs and Compliance
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Boulevard West
St. Paul, Minnesota 55102-1906

e-mail: maryann.heidemann@mnhs.org
phone: (651) 259-3456

----- Forwarded message -----

From: Gimmestad, Dennis (DOT) <dennis.gimmestad@state.mn.us>
Date: Thu, Mar 21, 2013 at 3:31 PM
Subject: Southwest LRT - consulting party request from Three Rivers Parks
To: "Heidemann, Mary Ann (MaryAnn.Heidemann@MNHS.ORG)" <MaryAnn.Heidemann@mnhs.org>

Mary Ann-

Attached is a request from the Three Rivers Park District for consulting party status in the Section 106 review of the Southwest LRT project.

Their letter establishes a clear basis for their interest in the project's effects on historic properties, and I plan to forward the request to FTA with a recommendation that it be approved. Please let me know if you concur.



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
312-886-0361 (fax)

April 10, 2013

Mr. Bill Walker
Cultural Resources Coordinator
Three Rivers Park District
3000 Xenium Lane North
Plymouth, Minnesota 55441-1299

Re: Consulting Party Status for the Southwest Corridor Transit Project


Dear Mr. Walker:

In your letter dated March 8, 2013 to the Minnesota Department of Transportation, Cultural Resource Unit (MnDOT CRU) and forwarded to the Federal Transit Administration (FTA), you requested consulting party status for the Section 106 process for the Southwest Corridor Transit Project. After consultation with the Minnesota State Historic Preservation Office (MnSHPO), we concur in this request and hereby offer consulting party status to your organization.

The FTA, the Metropolitan Council, and Hennepin County are working together on this project, and will share copies of Section 106 documents with consulting parties as the project proceeds. The MnDOT CRU is coordinating many aspects of the 106 process.

If you have any questions, please contact Bill Wheeler of my staff at (312) 353-2639 or Dennis Gimmestad of the MnDOT CRU at (651) 366-4292.

Sincerely,

for 
Marisol R. Simon
Regional Administrator

cc: Dennis Gimmestad, Minnesota DOT
Nani Jacobson, Metro Transit
Mary Ann Heidemann, Minnesota SHPO
Katie Walker, Hennepin County



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

25 February 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase I/II Architecture History Investigations, Volume Five (Supplemental Report Number Two); additional survey work in Minneapolis and St. Louis Park, SHPO #2009-0080

Dear Ms. Beimers:

We are continuing consultation regarding the identification of historic properties for the Southwest Light Rail Transit project. The report of additional Phase I/II architecture history investigations in Minneapolis and St. Louis Park, completed by Mead & Hunt, Inc. (February 2014), is enclosed. We are also providing copies of the survey report to those consulting parties in Minneapolis and St. Louis Park.

On 9 November 2011, we submitted the results of the architecture history survey of the Minneapolis West Residential Survey Zone. This zone is included in Volume Two of the architecture history survey reports. Item #5 in our 9 November 2011 letter acknowledged that several properties in this survey zone needed additional study, and you concurred on 8 December 2011. Subsequently, the Commercial Building on Maderia Avenue was determined not eligible, and was included in Volume Four, submitted to you on 8 May 2012. You concurred on 6 June 2012.

Phase II evaluations of the other properties in item #5 (Kenwood Parkway properties and three houses) have now been completed, and are included in the enclosed survey report. The report also includes a Phase I inventory of a synagogue in the St. Louis Park Survey Zone. This property was not included in the original Phase I survey due to an inaccurate date of construction in the database used for the survey.

Based on the findings of this survey, we have made the following determinations:

1. The following properties in the Minneapolis West Residential Survey Zone meet NRHP criteria:
 - A. **Mahaila and Zachariah Saveland House** (aka Franklin-Kelly House) (HE-MPC-6766), 2405 W. 22nd Street, criterion C (architecture). The historic name of this property has been changed to reflect the original owners, as the clients who commissioned the design of the house.

- B. **Frank W. and Julia C. Shaw House** (HE-MPC-6603), 2036 Queen Avenue South, criterion C (architecture).
 - C. **Kenwood Parkway Residential Historic District** (HE-MPC-18059), 1805-2216 Kenwood Parkway, criterion A (community planning and development). To aid in the review of this evaluation, Appendix B of the survey report includes the Phase I and Phase II survey forms for properties located in the district.
2. The Nora C. and William Klein House (HE-MPC-6761), 2305 W. 21st Street (Minneapolis West Residential Survey Zone), does not meet NRHP criteria (Phase II survey).
 3. The B'nai Abraham Synagogue (HE-SLC-566), 3115 Ottawa Ave. (St. Louis Park Survey Zone) does not meet NRHP criteria (Phase I survey).

Please submit comments on the above determinations within 30 days of this letter. We look forward to continuing to work with you to address potential adverse effects on historic properties as the planning process for this project proceeds. Contact me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

- cc: Maya Sarna, Federal Transit Administration
 Bill Wheeler, Federal Transit Administration
 Nani Jacobson, Metropolitan Council
 Caroline Miller, Metropolitan Council
 Kathryn O'Brien, Metropolitan Council
 Katie Walker, Hennepin County
Section 106 Consulting Parties:
 Jack Byers, Minneapolis Community Planning and Economic Development
 Brian Schaffer, Minneapolis Heritage Preservation Commission
 Jennifer Ringold, Minneapolis Park and Recreation Board
 Jeanette Colby, Kenwood Isles Area Association
 Meg McMonigal, City of St. Louis Park
 Nancy Anderson, City of Hopkins
 Elise Durbin, City of Minnetonka
 Regina Rojas, City of Eden Prairie
 Bill Walker, Three Rivers Park District



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

27 February 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase II
Archaeological Survey, SHPO #2009-0080

Dear Ms. Beimers:

We are continuing consultation regarding the identification of historic properties for the Southwest Light Rail Transit project. The report of the phase II archaeological survey, completed by 10,000 Lakes Archaeology Inc., Archaeological Research Services, Archaeo-Physics LLC, and Merjent Inc. (February 2014), is enclosed.

This phase II archaeological survey follows the completion of a phase 1A investigation (September 2010), a supplemental phase 1A investigation for a freight rail relocation corridor (June 2012), and a phase I survey (December 2012). You commented on the reports of these surveys in your letters dated 29 October 2010, 27 July 2012, 14 February 2013, and 12 March 2013.

The phase I archaeological survey recommended eight sites for phase II investigation. One of these sites was determined to be outside the area of potential effect for archaeology; the other seven sites are included in this phase II report. (See our letters of 17 January 2013 and 15 February 2013, and your responses of 14 February 2013 and 12 March 2013, for consultation on the site that was eliminated from the phase II survey scope.)

Based on the findings of the phase II survey, we have made the following determinations:

1. The following properties meet NRHP criteria:
 - A. **St. Paul and Pacific Rail Bed** (21HE0435), St. Louis Park, NRHP criteria C and D
 - B. **Cedar Lake Ice Company** (21HE0409), Minneapolis, NRHP criterion D

2. **Royalston North** (21HE0436) and **Royalston South** (21HE0437) will require further investigation to determine NRHP eligibility. Since the area that needs to be surveyed is under the northbound lane of Royalston Avenue in Minneapolis, we will need to consult further about the timing of the investigation vis-à-vis the project schedule and the Section 106 agreement for the project. (Note: the phase I survey report included these two sites within one area.)
3. The following properties do not meet NRHP criteria:
 - A. Brookview Terrace (21HE0413), St. Louis Park
 - B. Upton Avenue Ridge (21HE0412), Minneapolis
 - C. M&StL Cedar Lake Yards (21HE0408), Minneapolis
 - D. Kenwood Station (21HE0414), Minneapolis

Please submit comments on the above determinations within 30 days of this letter. We look forward to continuing to work with you to address potential adverse effects on historic properties as the planning process for this project proceeds. Contact me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Kathryn O'Brien, Metropolitan Council
Katie Walker, Hennepin County
Section 106 Consulting Parties:
Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Bill Walker, Three Rivers Park District



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

2 April 2014

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

RE: Southwest Light Rail Transit, Hennepin County, Minnesota; property boundaries for Grand Rounds segments and M&StLRR Hopkins Depot, SHPO #2009-0080

Dear Ms. Beimers:

The Southwest Light Rail Transit Project is completing its review under the requirements of Section 4(f) of the *Department of Transportation Act of 1966*. Because the 4(f) analysis focuses in part on *use* of a historic property, precise boundaries of a property are often an important consideration.

On 28 August 2013, I met with Denis Gardner of your office to discuss boundaries for historic properties in three project locations. Two of these locations involve portions of the eligible Grand Rounds Historic District. As you know, the survey and evaluation documentation of this extensive eligible district, prepared by Hess Roise, includes maps which delineate the boundaries. However, the scale of those maps does not allow discernment of the boundaries on a property parcel level. The third location includes the M&StLRR Hopkins Depot. The survey report (*Phase I/Phase II Architecture History Investigation for the Proposed Southwest Transitway Project Hennepin County, Minnesota*, Volume Three, October 2010) includes a boundary delineation, but, upon further review, we have concluded that an adjustment to those boundaries is appropriate.

Attached are maps of the historic property boundaries we have delineated for each of the three locations, as detailed below:

1. Grand Rounds, Kenilworth Lagoon/Channel. This property, HE-MPC-1822, includes the waterway between Lake of the Isles and Cedar Lake. The detailed boundaries we have delineated are based on those shown on Map 2 of 24 and Map 24 of 24 in the Grand Rounds survey and evaluation documentation. The detailed boundaries generally follow (or connect) property parcel lines which separate public park property from private property.
2. Grand Rounds, Cedar Lake Parkway. This parkway, HE-MPC-1833, extends from Dean Parkway southeast of Cedar Lake around the lake's southern and western shores. We have delineated detailed boundaries for the section of the parkway in the Southwest project APE, based on those on Map 24 of 24 in the Grand Rounds survey and evaluation documentation. They generally follow (or connect) property parcel lines which separate public park property from private property.

3. M&StLRR Hopkins Depot. This property, HE-HOC-14, is an eligible railroad depot located along a non-eligible railroad corridor. The evaluation of the building is found on pages 35-39 of Volume Three of the architecture history survey for the project. Page 39 includes recommended boundaries. Upon further review, the report's recommended northern and western boundaries appear to be appropriate. The report's recommended eastern boundary utilizes a "Washington Avenue easement", which has been difficult to locate, so we have redrawn the eastern boundary to be 30 feet east of the building, mirroring the western boundary. The report's recommended southern boundary is the edge of the recreational trail, which appeared to be an appropriate reflection of the edge of the associated (but not eligible) rail corridor. However, a broader view of the adjacent property shows that the segment of the recreational trail by the depot actually dips southward from the linear historic rail alignment (visible in shadow on the attached map). Therefore, we have redrawn the depot's southern boundary to run adjacent and parallel to what was the strictly linear historic rail alignment. This places the boundary at the southern edge of the existing patio area.

The boundaries on these maps were discussed with Mr. Gardner last August, and determined to be appropriate. We are following up with this letter to provide a written record of our consultation. We would appreciate a response from you within 30 days of this letter.

We look forward to continuing to work with you as the planning process for this project proceeds. Contact me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Kathryn O'Brien, Metropolitan Council
Katie Walker, Hennepin County
Jack Byers, Minneapolis Community Planning and Economic
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Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Bill Walker, Three Rivers Park District

Cedar Lake

Lake of the Isles

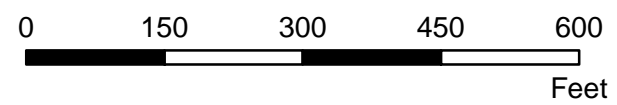
Kenilworth Lagoon/Channel
HE-MPC-1822






1:2,500

Kenilworth Lagoon/Channel, HE-MPC-1822
Grand Rounds Historic District, Minneapolis
Historic Boundary, DRAFT - WORK IN PROGRESS

Map Created 02/13/14



Legend

-  Draft Grand Rounds HD Bdy
-  SDEIS Alignment 11/13
-  Parcels





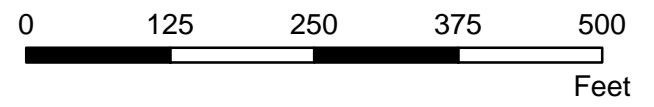
Cedar Lake

Cedar Lake Parkway
HE-MPC-1833






1:2,000

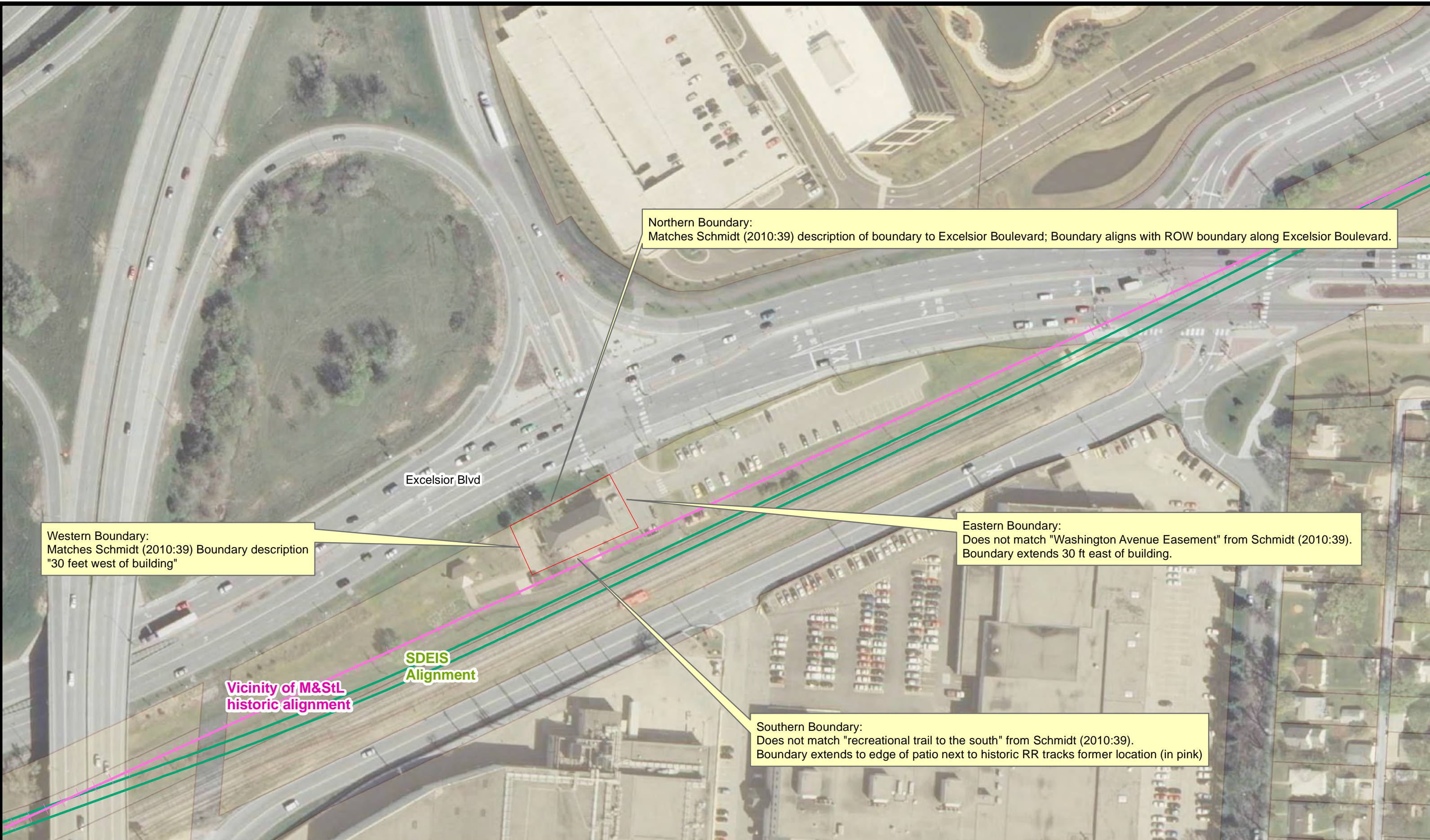
Cedar Lake Parkway, HE-MPC-1833
Grand Rounds Historic District, Minneapolis
Historic Boundary, DRAFT - WORK IN PROGRESS
Map Created 02/13/14



Legend

-  SDEIS Alignment 11/13
-  Historic_District_GrandRounds_20140123
-  Parcels





Northern Boundary:
Matches Schmidt (2010:39) description of boundary to Excelsior Boulevard; Boundary aligns with ROW boundary along Excelsior Boulevard.

Western Boundary:
Matches Schmidt (2010:39) Boundary description
"30 feet west of building"

Eastern Boundary:
Does not match "Washington Avenue Easement" from Schmidt (2010:39).
Boundary extends 30 ft east of building.

Southern Boundary:
Does not match "recreational trail to the south" from Schmidt (2010:39).
Boundary extends to edge of patio next to historic RR tracks former location (in pink)

Excelsior Blvd

Vicinity of M&StL
historic alignment

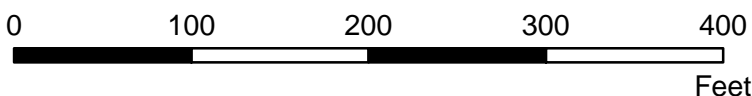
SDEIS
Alignment



**Minneapolis and St. Louis RR Depot, HE-HOC-14
Hopkins
Historic Boundary, DRAFT - WORK IN PROGRESS**

1:1,300

Map Created 02/13/14



Legend

- SDEIS Alignment 11/13
- LRT3A_LRT3A1_hist_properties_121613
- Parcel Boundary



STATE HISTORIC PRESERVATION OFFICE

April 2, 2014

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & Downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Phase I/II Architecture History Investigations)

Dear Mr. Gimmestad,

Thank you for continuing consultation on above-referenced project. It is being reviewed under Section 106 of the National Historic Preservation Act (36CFR800) and provisions of the Minnesota Historic Sites Act.

We have completed our review of the survey report entitled *Phase I/Phase II Architecture History Investigation for the Proposed Southwest Light Rail Transit Project, Hennepin County, Volume 5, Supplemental Report Number Two, Additional Areas/Properties in the Following Survey Zones: St. Louis Park Survey Zone, Minneapolis West Residential Survey Zone* (February 2014) which was submitted to our office on 25 February 2014.

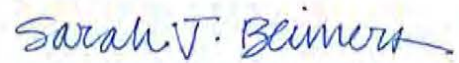
We concur with your agency's determination that the following properties are eligible for listing in the National Register of Historic Places (NRHP):

- **Mahalia and Zachariah Saveland House** (HE-MPC-6766), 2405 West 22nd Street, Minneapolis - eligible under criterion C (architecture);
- **Frank W. and Julia C. Shaw House** (HE-MPC-6603), 2036 Queen Avenue South, Minneapolis - eligible under criterion C (architecture);
- **Kenwood Parkway Residential Historic District** (HE-MPC-18059), 1805 – 2206 Kenwood Parkway, Minneapolis – the residential historic district is eligible under criterion A (community planning and development). For clarification to what is stated in the report regarding the residential district's eligibility under criterion C, this parkway section is part of the contributing Kenwood Parkway Sub-segment of the Grand Rounds, a property previously determined eligible for listing in the NRHP under both criteria A and C.

We also concur with the determination that both the Nora C. and William Klein House (HE-MPC-6761) and the B'nai Abraham Synagogue (HE-SLC-566) are **not eligible** for listing in the NRHP.

Again, we thank you for your agency's commitment to completing high-quality identification and evaluation survey reports for the proposed light rail project. Feel free to contact me at 651-259-3456 or sarah.beimers@mnhs.org if you have any questions or concerns regarding our review.

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers". The signature is written in a cursive style with a horizontal line at the end.

Sarah J. Beimers
Manager, Government Programs and Compliance

cc: Hilary Dvorak, Minneapolis Heritage Preservation Commission
Heather Goodson, Mead and Hunt

STATE HISTORIC PRESERVATION OFFICE

April 2, 2014

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & Downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080 (Phase II Archaeological Survey)

Dear Mr. Gimmestad,

Thank you for continuing consultation on above-referenced project. It is being reviewed under Section 106 of the National Historic Preservation Act (36CFR800) and provisions of the Minnesota Historic Sites Act.

We have completed our review of the survey report entitled *Phase II Archaeological Survey for the Southwest Light Rail Transit Project* (February 2014) which was submitted to our office on 27 February 2014.

We concur with your agency's determination that the following properties are **not eligible** for listing in the National Register of Historic Places (NRHP):

- **Brookview Terrace (21HE0413)**, St. Louis Park
- **Upton Avenue Ridge (21HE0412)**, Minneapolis
- **M&StL Cedar Lake Yards (21HE0408)**, Minneapolis
- **Kenwood Station (21HE0414)**, Minneapolis

We also concur with the determination that the following properties are **eligible** for listing in the NRHP:

- **St. Paul & Pacific Rail Bed (21HE0435)**, St. Louis Park, eligible under criteria C and D
- **Cedar Lake Ice Company (21HE0409)**, Minneapolis, eligible under criterion D

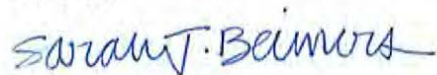
Regarding the sites identified as **Royalston North (21HE0436)** and **Royalston South (21HE0437)** in Minneapolis, your agency has indicated that additional field survey is necessary in order to determine NRHP eligibility and that this additional survey would potentially be combined with Phase III treatment. While we do agree that additional Phase II evaluation work may be warranted for these sites, we believe that the current information is sufficient to demonstrate that the two Royalston sites are **eligible** for

listing in the NRHP under criterion D. If future investigation does take place in the existing Royalston Road street bed and intact archaeological deposits are found, then they may contribute to the significance of these two sites. However, it is our feeling that if additional intact deposits are not found, the two sites would still be eligible.

Again, we thank you for your agency's commitment to completing high-quality identification and evaluation survey reports for the proposed light rail project. In particular, this Phase II archaeological survey and evaluation is an excellent report and provides a significant contribution to the archaeology of the Minneapolis and St. Louis Park metropolitan area.

Feel free to contact me at 651-259-3456 or sarah.beimers@mnhs.org if you have any questions or concerns regarding our review.

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers". The signature is written in a cursive, flowing style.

Sarah J. Beimers
Manager, Government Programs and Compliance



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

18 April 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; consultation on potential effects; SHPO #2009-0080

Dear Ms. Beimers:

We are writing to continue consultation on the Southwest Light Rail Transit Project. This letter includes updated information on historic properties and on project effects that will serve as a basis for a Section 106 Agreement. Following standard practice, all Section 106 consulting parties for this project are copied on this letter, and we welcome all parties to review the material, participate in an upcoming consultation meeting on 30 April (see below), and submit any comments within the 30-day review period.

This submittal includes information related to potential project effects and potential measures to avoid, reduce, or mitigate adverse effects. The information updates the material discussed with your office and all consulting parties at the Hennepin County Library in Hopkins in April 2012, during preparation of the Draft Environmental Impact Statement (DEIS). Since that time, additional cultural resource surveys have been completed, preliminary engineering has advanced, and the Metropolitan Council (Council) has adopted a resolution approving the project scope and budget.

Before describing the information contained in this submittal, we would like to thank you for your responses to our recent letters on the phase II archaeological survey and on volume five of the architecture history survey. Taking into account your comments on the evaluation of Sites 21HE0436 and 21HE0437 in the phase II archaeological survey, we have determined that both sites are eligible to the National Register under criterion D. Further work on these eligible sites would include additional phase II investigation of the area indicated in figure 12.21 of the phase II survey report as well as phase III data recovery. It is recognized that the additional phase II work could result in a revision of the site boundaries. Please indicate your concurrence with this determination of eligibility.

The materials listed below are included in this submittal. Note that, to date, no historic properties have been identified in the western portion of the project (in Eden Prairie and Minnetonka), therefore some of the materials only cover the eastern portion of the project (in Hopkins, St. Louis Park, and Minneapolis).

- Table of Potential Effects on Historic Properties (4/15/14). This table lists all eligible and listed historic properties, working roughly from west to east along the project corridor. As in previous materials, elements of the Grand Rounds Historic District are listed separately in the table, due to their dispersed locations. The assessments of potential effect are based on preliminary project engineering as shown in the Municipal Consent Plans. Final determinations of adverse effects will be made by the Federal Transit Administration.
- Photo Log of Historic Properties (4/14), keyed to the above table.
- Historic Properties Map (4/10/14, 6 sheets). (***Contains archaeological site locations; please do not post or distribute.***) These sheets show the entire corridor, the areas of potential effect (APEs) for architecture/history and for archaeology, and all identified listed and eligible historic properties.

The maps incorporate a number of APE adjustments since publication of the DEIS, that are consistent with the resolution passed by the Council. To address the range of potential effects, these adjustments extend the architecture/history APE to encompass the entire Kenilworth Lagoon/Channel and the entire Kenwood Parkway Residential Historic District (sheet 5), and extend both APEs to incorporate project related work at several locations. Areas in the extensions not previously surveyed are being surveyed, and any identified eligible historic properties will be included in future consultation.

We note that sheets 1 and 2 of these maps show one area between the Golden Triangle and the City West Stations where the LRT tracks extend outside the original archaeological APE. This area will be addressed in future submittals. Again, any additional identified eligible historic properties will be included in future consultation.

- Track Drawings East Segments (4/14, 23 sheets). (***Contains archaeological site locations; please do not post or distribute.***) These drawings are excerpted from the Municipal Consent Plans, currently under review by the cities in the project corridor. They illustrate the relationship between elements of the project and many of the historic properties.
 - The first six index sheets show the entire east segment, from Hopkins to Target Field. All historic properties are noted. (Some properties which lie outside the edges of the plan sheets are noted on the margins; see the historic properties map for specific locations of these). On these six index sheets, seventeen individual sheets which include historic properties are outlined in red.

- The seventeen individual plan and profile sheets are also included to show more detail of areas with historic properties.
- Other attachments.
 - Attachment A includes visualizations near the M&StL Depot in Hopkins, showing the LRT bridge over Excelsior Blvd.
 - Attachment B includes a cross section of the shallow LRT tunnel under the Grand Rounds/Cedar Lake Parkway in Minneapolis.
 - Note that more information on the new bridges over the Kenilworth Lagoon/Channel will be presented at the upcoming 30 April consultation meeting.

The bullets below summarize the various types of potential effects and related avoidance/reduction/mitigation measures included in the Table of Potential Effects on Historic Properties (numbers refer to the row on the table):

- Ten historic properties will not be adversely affected, based on preliminary engineering and station area plans. These properties are: Hopkins City Hall (1), CM&StP St. Louis Park Depot (4), Hoffman Callan Building (6), Minikahda Club (7), Grand Rounds/Lake Calhoun (8), Mac Martin House (24), Dunwoody Institute (28), Minneapolis St. Paul & Manitoba RR Historic District (26), Osseo Branch/Minneapolis St. Paul & Manitoba RR Historic District (27), and the Minneapolis Warehouse Historic District (31).
- Four individual historic properties will experience project construction nearby. The intent is to avoid adverse effects through continuing consultation on project design, and/or incorporation of protective measures. These properties are: M&StL Hopkins Depot (3), Peavey-Haglin Experimental Concrete Grain Elevator (5), Grand Rounds/Cedar Lake Parkway (9), and Archaeological Site 21HE0409 (19).
- Six historic properties located in the area of the Kenilworth Lagoon/Channel will be affected by the construction of new bridges (freight rail and LRT/trail) across the waterway. The intent is to minimize or avoid adverse effects through sensitive project design and incorporation of protective measures; determination of the level of effect will be made after further consultation with your office and the consulting parties. Potential noise effects at this location also may need further consideration. The properties include the Lagoon/Channel itself (13) and four other Grand Rounds properties – Cedar Lake (14), Lake of the Isles (15), Lake of the Isles Parkway (16), and Park Board Bridge #4 (17) – as well as the Lake of the Isles Residential Historic District (18).

- Four historic properties located near the Penn LRT Station may be affected by access routes between the station and Kenwood Parkway. Further consultation/assessment on this issue is needed as specific routes are developed. Effects may relate to changes to Kenwood Parkway itself and to traffic and parking; the intent is to avoid adverse effects through design consultation and/or other measures. These properties are: the Kenwood Parkway Residential Historic District (20) and three Grand Rounds properties – Kenwood Parkway (21), Kenwood Park (22), and the Kenwood Water Tower (23). There will also be additional assessment of potential noise effects on a few properties in the northern part of the residential historic district.
- One historic property, the Hopkins Commercial Historic District (2), is located in an area around the Downtown Hopkins LRT Station that is expected to undergo increased redevelopment activity, a primary goal of station area planning efforts. Preservation of historic buildings as part of this redevelopment (and avoidance of adverse effects) would be encouraged through completion of documentation that may be used by SHPO (at its discretion and working with city) to nominate the district for National Register listing. This, in turn, would qualify the area for preservation tax incentives and other available preservation funding.
- Two archaeological properties will be substantially disturbed for construction of Royalston Station. Alternative station locations have previously been investigated in consultation with the city, but have not been deemed feasible. The archaeological sites are eligible for the National Register based on their potential to contain important information, and the potential adverse effect of removing the sites would be mitigated with a Phase III Archaeological Data Recovery. These properties are: Archaeological Sites 21HE0436 (29) and 21HE0437 (30).
- Four properties are non-contributing elements of the Grand Rounds Historic District. Two (the railroad bridges) elements will be removed, and two elements will be untouched; in all cases there will be no adverse effect to the historic district. These properties are: Two Grand Rounds/Railroad Bridges over the Kenilworth Lagoon (10, 11), Grand Rounds/Burnham Road Bridge (12), and Grand Rounds/The Parade (25).

As you know, during the review period for this submittal, we have scheduled a consultation meeting for your office and for Section 106 consulting parties to provide an opportunity for questions and discussion on this review. The meeting will be held at the Southwest Project Office, 6465 Wayzata Boulevard, Suite 500, St. Louis Park, on April 30, 2014. The first part, beginning at 10:00, will include all historic properties in the project area. The second part, beginning about 12:00, will focus

specifically on the design of the new bridges across the Kenilworth Lagoon/Channel. Lunch will be provided. All consulting parties will be receiving an invitation to the meeting, and we look forward to the discussion.

We note that two additional surveys for the Southwest project will be submitted for your review in the near future. These surveys – an archaeology 1A survey and a phase I/II architecture history survey – cover expansions to the project’s APE related to project additions and modifications in Eden Prairie and in St. Louis Park/Minneapolis, as well as an operations and maintenance facility in Hopkins. All these areas will be addressed in an upcoming Supplemental Draft Environmental Impact Statement (SDEIS). Any additional identified eligible historic properties will be included in future consultation.

Please submit comments on the project effect assessments included in this submittal within 30 days of this letter. Contact me at 651-366-4292 with any questions or concerns.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Katie Walker, Hennepin County
Liz Abel, MnDOT CRU
Kristen Zschomler, MnDOT CRU

Section 106 Consulting Parties:

Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Bill Walker, Three Rivers Park District



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

8 May 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Cultural Resource Investigations for areas in the Supplemental Draft Environmental Impact Statement (Phase I/II Architecture History Investigation, Volume Six; and Phase 1a Archaeology Investigation); areas in Eden Prairie, Hopkins, St. Louis Park and Minneapolis; SHPO #2009-0080

Dear Ms. Beimers:

We are continuing consultation regarding the identification of historic properties for the Southwest Light Rail Transit project. This letter transmits the reports of two cultural resources investigations for three areas of adjustments to the project. The three areas will be included in an upcoming Supplemental Draft Environmental Impact Statement (SDEIS).

The three areas, shown in the attached figures from the reports, are:

- Eden Prairie Segment. The proposed light rail alignment and stations in the Eden Prairie Segment have been adjusted south to provide better connections to local activity centers.
- Hopkins Operations and Maintenance Facility (OMF). The project now includes a proposed OMF in the city of Hopkins. The proposed site is not one of the four potential OMF sites identified in the Draft Environmental Impact Statement.
- St. Louis Park/Minneapolis Segment. In the St. Louis Park/Minneapolis Segment, the proposed project has been adjusted to include two proposed light rail tunnels in the Kenilworth Corridor; the proposed 21st Station has been removed; proposed freight rail modifications have been incorporated; and the location and capacity of proposed park-and-ride lots have been adjusted.

Note that the above adjustments appear in the project plans which were included in the consultation package submitted to you on April 18, 2014.

The two cultural resource investigations of these areas have been completed by The 106 Group Ltd. They are as follows:

- Phase I/II Architecture History Investigation Southwest LRT Project Hennepin County Minnesota, Volume Six, Supplemental Report Number Three (SDEIS).

This phase I/II architecture history survey included additional survey areas in the following Southwest survey zones: Eden Prairie, Hopkins, St. Louis Park, and Minneapolis West Residential. Forty one properties were inventoried. One of these properties, the Edgar J. Couper House (HE-MPC-5145, 1819 Mt. Curve Ave., Minneapolis), was evaluated for eligibility to the National Register of Historic Places (NRHP) at the Phase II level.

Based on the findings of the survey, we have determined that the three areas included in the SDEIS have no NRHP listed/eligible architecture history properties in addition to those previously identified in surveys for the Southwest project. This determination includes the Couper House, which was evaluated as “not eligible” at the Phase II level in the SDEIS survey.

Please note that Section 3.4.1 (page 3-1) and Figure 2c of this report indicate that the Kenwood Parkway Residential Historic District is “under evaluation”, which it was at the time the report was prepared. Based on the evaluation in volume five of the Southwest architecture history survey, completed earlier this year, our office has recently determined that this district is NRHP eligible, and you have concurred with that determination in your letter of April 2, 2014. The district now appears in consultation materials as eligible.

- Phase 1a Archaeology Investigation Southwest LRT Project Hennepin County Minnesota

The phase 1a archaeology survey of the SDEIS areas identified three areas of archaeological potential – areas A, B, and C – and recommends phase I surveys of these areas. All are located in the Eden Prairie Segment.

Outside of the above three areas, we have determined that the SDEIS areas have no NRHP listed/eligible archaeology properties in addition to those previously identified in surveys for the Southwest project. Note that the phase 1a findings will be included in the SDEIS, paralleling the inclusion of the original phase 1a survey findings in the DEIS.

We anticipate completion of the phase I surveys of areas A, B, and C in the 2014 field season.

Please note that Section 2.5.2 (page 2-2) and Table 2 (page 2-3) of the phase 1a report indicate that four archaeological sites (21HE0408, 21HE0409, 21HE0412, and 21HE0414) are “currently being evaluated”, which they were

at the time the report was prepared. Based on the phase II archaeological survey, completed earlier this year, our office has recently determined that Site 21HE0412 is NRHP eligible, and you have concurred with that determination in your letter of April 2, 2014. Site 21HE0412 now appears in consultation materials as eligible. The other three sites have been determined not eligible, and you have concurred with those determinations as well.

Please submit comments on these investigations within 30 days of this letter. We look forward to continuing to work with you to address potential adverse effects on historic properties as the planning process for this project proceeds. Contact me at 651-366-4292 with any questions or concerns.

Sincerely,

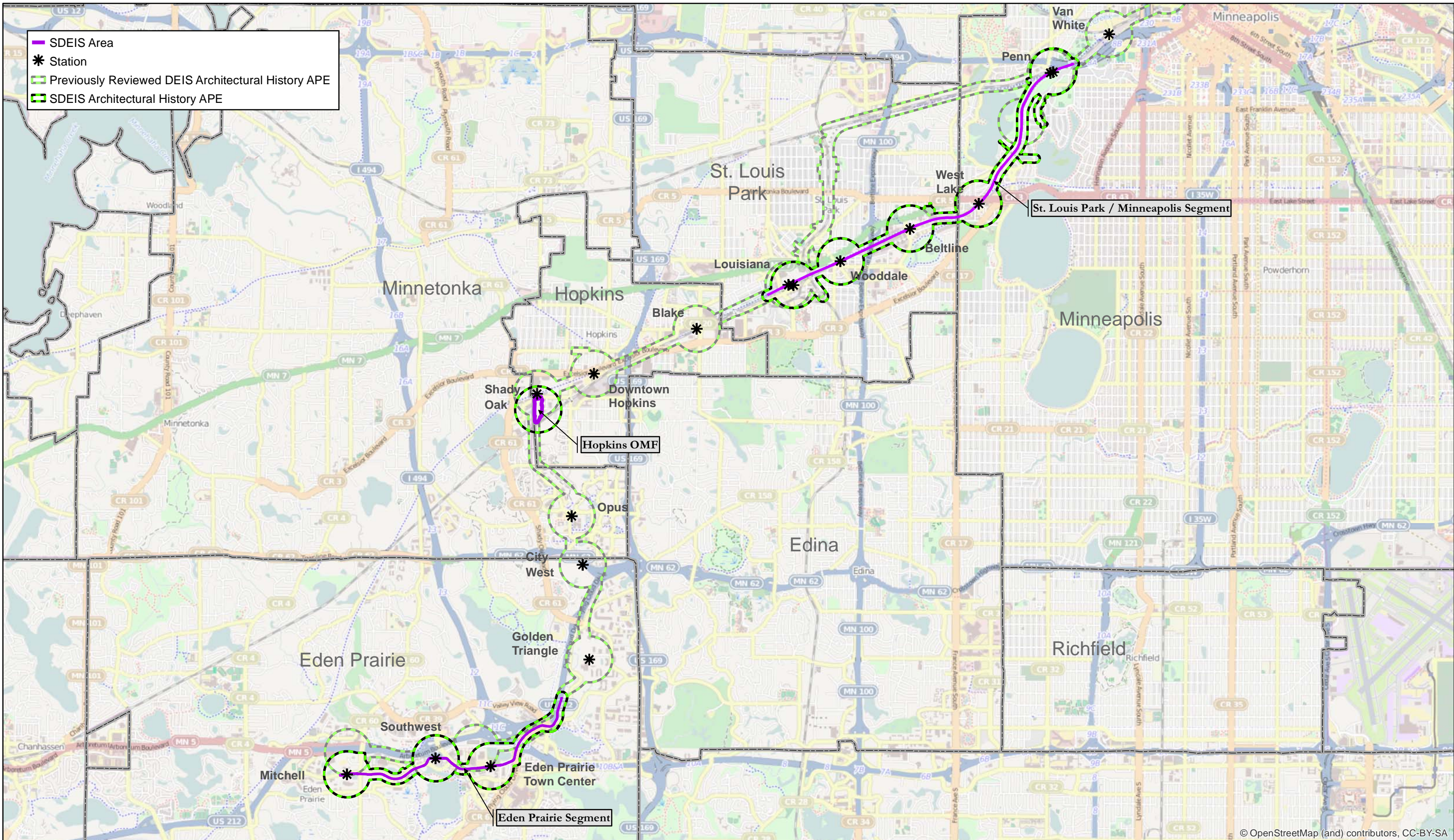


Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Katie Walker, Hennepin County

Section 106 Consulting Parties:

Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Bill Walker, Three Rivers Park District



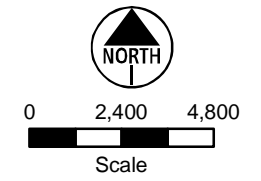
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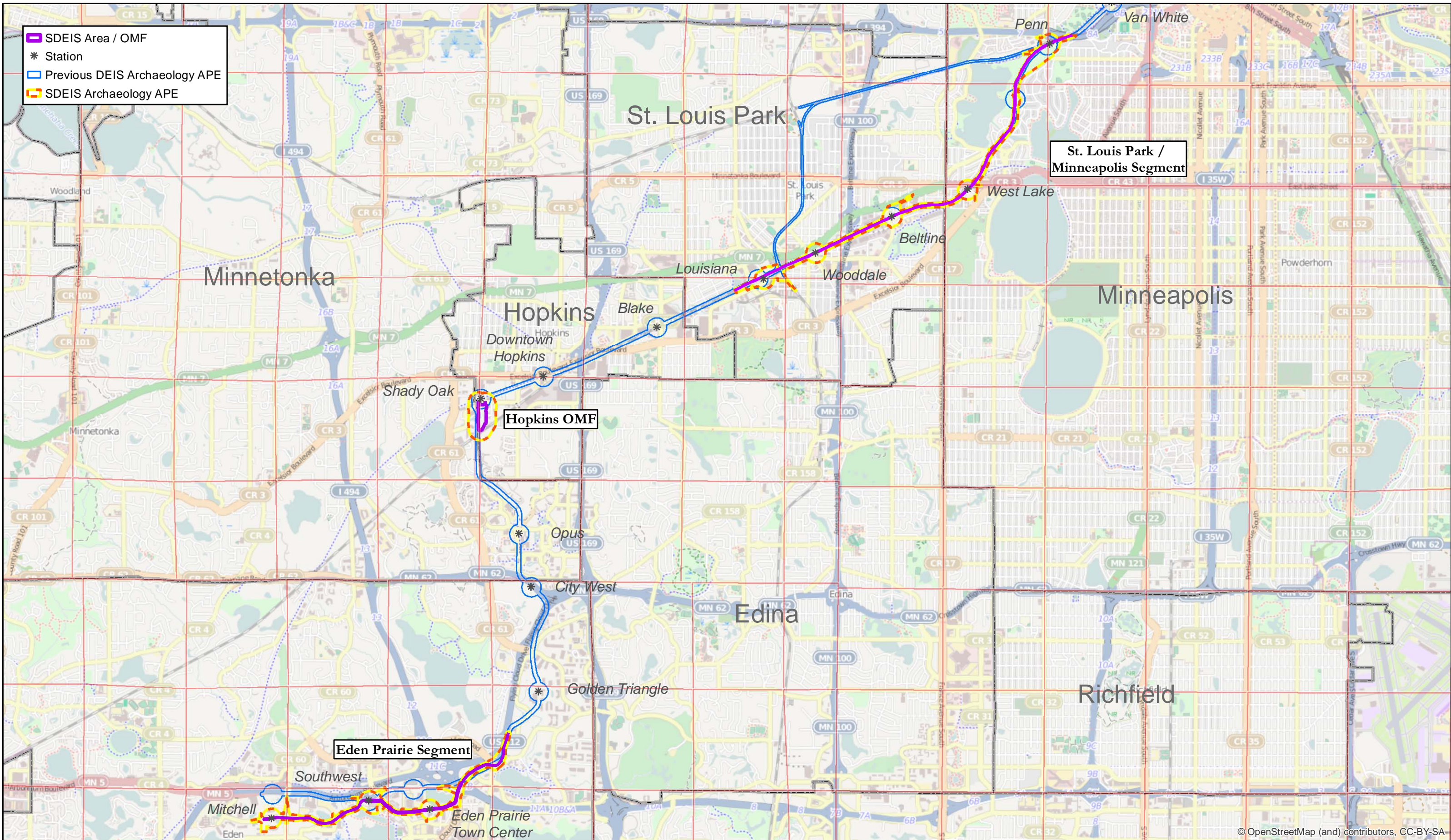


SOUTHWEST LRT

Phase I/Phase II Architectural History Investigation - Volume Six
Figure 1 - Project Location

Rev 04-00
4/21/2014





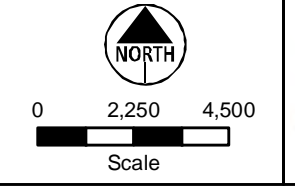
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SOUTHWEST LRT

Phase Ia Archaeological Investigation -SDEIS Areas
Figure 1 - Project Location

Rev 04-00
3/20/2014



From: [Byers, Jack P.](#)
To: [Gimmestad, Dennis \(DOT\)](#)
Cc: sarah.beimers@mnhs.org; [Jacobson, Nani \(Nani.Jacobson@metrotransit.org\)](mailto:Jacobson.Nani@metrotransit.org); [Hager, Jenifer A](#); [Schaffer, Brian C.](#)
Subject: Southwest LRT 106 Consultation - Your request for comments from Minneapolis by May 18th
Date: Friday, May 16, 2014 11:02:32 AM

Dennis,

Thank you for convening all of the consulting parties on the Southwest Transitway Section 106 process on April 30th. We appreciate your presentation of the updated Potential Effects table and we appreciate the research and chronology that the 106 Group presented during that meeting. Both were illuminating and very helpful. Thank you for your hard work on this project.

As you are aware, the City of Minneapolis and the other municipalities along the proposed corridor are currently engaged the Municipal Consent process; one that includes a specific set of proposals from SPO. City of Minneapolis staff are reviewing the SPO package and preparing our comments for subsequent review and consideration by our City Council. City staff are certainly keeping matters related to historic resources in mind as we conduct our Municipal Consent review. However, given that the Municipal Consent process is formally underway, it would be premature for us to comment specifically on 106 matters separately and before our City Council's review and decision on Municipal Consent is completed.

Thank you for understanding. Please feel free to contact me if you have any questions or require further clarification.

Regards,
Jack Byers

Jack Byers, AICP

Long Range Planning Manager

City of Minneapolis – Community Planning and Economic Development

105 Fifth Avenue South – 200
Minneapolis, MN 55401-2534

Office: 612-673-2634

jack.byers@minneapolismn.gov

www.minneapolismn.gov/cped





**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400
Fax:
612-230-6500

www.minneapolisparcs.org

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Jayne Miller

Secretary to the Board
Pamela French



May 16, 2014

Dennis Gimmestad
MNDOT Cultural Resources Unit
Office of Environmental Stewardship
Mail Stop 620
395 John Ireland Boulevard
Saint Paul, MN 55155

RE: Southwest Light Rail Transit Project, Minneapolis Park and Recreation Board Comments on April 18, 2014 Consultant Materials

Dear Mr. Gimmestad:

Thank you for the opportunity to review the Section 106 materials provided to Sarah Beimers of the Minnesota State Historic Preservation Office and to participate in the April 30, 2014 consultant meeting for the Southwest Light Rail Transit (SWLRT) Project. Minneapolis Park and Recreation Board (MPRB) staff provide the following comments on the materials:

Table of Potential Effects on Historic Properties (4/15/14)

- 1) *No 8, Grand Rounds/Lake Calhoun (eligible) HE-MPC-01811:* No adverse effect is indicated for this portion of the Grand Rounds Historic District based on preliminary engineering and station area plans. This property is close to the station area in an area of the city that has poor vehicle, pedestrian and bicycle circulation. The MPRB is concerned that this property will be adversely impacted by changes to traffic and parking patterns that result from the SWLRT project in this area. We request continued consultation on this property throughout the final design and development of the SWLRT, similar No 21, Grand Rounds/Kenwood Parkway (eligible) HE-MPC-01796 in the table.
- 2) *No 9, Grand Rounds/Cedar Lake Parkway (eligible) HE-MPC-01833:* The MPRB is concerned about the long-term noise and visual intrusion at this intersection and its impacts on adjacent park land. We understand this it is currently a quiet zone. We also understand that this status is unique and are concerned that this designation may not carry over into the SWLRT project. The MPRB is welcomes the opportunity to continue the consultation on this intersection.
- 3) *No 13, Grand Rounds/Kenilworth Lagoon/Channel (eligible) HE-MPC-1822:* The MPRB agrees with the need for continued consultation on the impacts to the Kenilworth Channel and Lagoon. The size and scale of the proposed bridge structures are not consistent with the design intent and historic cultural landscape of the channel. The MPRB would

like to include the introduction of massive portals on each side of the channel to this review, as well as the noise and vibration impacts that will result from the SWLRT moving in and out of the shallow tunnels and crossing the channel. The MPRB is concerned that it will not be possible to mitigate the impacts of bridge structures and portals that co-locate freight, light rail and trail over the channel. To assist with defining the design intent and historic landscape character of the Kenilworth Channel and Lagoon, the MPRB provides the following information:

The creation of the Kenilworth Lagoon was driven by rising interest in “water sports of all kinds on the lakes and streams,” according to Theodore Wirth, writing in his 1944 history of the park system. As early as 1906, Wirth’s first year as superintendent, one of his main goals was to connect Isles, Calhoun, Cedar, and Brownie together, an idea called the “Venice of America”—with specific reference to the “beautiful drives and bridges”—in the 1908 Board President’s Report.

Excavation of the Kenilworth Lagoon as far as the Minneapolis and St. Louis Railroad was completed in 1911 and extended to Cedar Lake by 1913. In his 1914 Superintendent’s Report, Wirth notes the adoption of the name “Kenilworth Lagoon” for the entire water connection between Isles and Cedar, and describes its original design:

“During the winter season the grounds along the south shore of the lagoon, between Bridge No. 4 [Lake of the Isles Parkway over the Kenilworth Lagoon] and the railroad, were graded, and in the spring seeded and planted, and they have become very attractive in their new garb of lawn and shrubbery. During the fall months the north side of the main lagoon and the banks of the waterway between the railroad bridge and Cedar Lake have also been graded, dressed with loam, planted, and seeded. Walks along both shores have been established leading from Lake of the Isles Boulevard to Cedar Lake Avenue, or what is now called ‘Burnham Avenue.’ Pipe rails were erected along the walks where they come close to the narrow channel under the railroad bridge.

This work was completed less than a year after similar planting and grading was done around Lake of the Isles and along the channel between Isles and Calhoun. Wirth viewed the dredging and interconnection of the four lakes as a single grand project with similar design parameters. In 1907 he envisioned that the Isles-Calhoun connection would have a “natural picturesque appearance.” This design style would have been applied to the entire chain of lakes.

The interconnection of the lakes required six bridges, which were enumerated in the 1909 Annual Report. A competition was held to design them, and designs were selected and built over the Lake Calhoun inlet (bridge #1), Lake of the Isles outlet to Calhoun (bridge #3), and the Kenilworth Lagoon at Lake of the Isles (bridge #4). The railroad bridge over the Isles-Calhoun channel (bridge #2) was built by the railroad. These four bridges were completed in 1911. A design was purchased for the Burnham Road (then

“Cedar Lake Avenue”) bridge (bridge #6) but it was never built. Bridge #5, the railroad bridge over the Kenilworth Lagoon at the present day location of the proposed Southwest LRT crossing, was completed in 1913 and considered temporary.

Though in 1909 Wirth agreed to focus efforts and money on the more prominent Bridges 1, 3, and 4, by 1913 he “[hopes that the railroad company will replace [the temporary timber structure] in due time with a better and safer structure.” In 1916, two years after completion of the Kenilworth Lagoon with its plantings and trails, the railroad bridge continued to bother Wirth: “I wish to renew my suggestion that the city be requested to build a suitable permanent bridge across the channel on Cedar Lake Avenue (Burnham Road), and that the Minneapolis and St. Louis Railway Company replace the unsightly wooden bridge with a permanent, neat looking concrete structure.”


The Kenilworth Lagoon was originally envisioned as a recreational water and pedestrian connection in the picturesque style that predominated throughout the Isles/Calhoun area. All the bridges in the area—including the railroad bridges—were considered key features of that recreational connection. In the 1914 Annual Report, Wirth sets forth his grand vision specifically for the Kenilworth Lagoon:

“After permanent ornamental bridges have been established to replace the present unsightly wooden structures [of the Burnham Road and Minneapolis and St. Paul Railroad bridges], this waterway between the two lakes will be one of the most attractive features of the entire park system, viewed alike from land or water.”

- 4) *No 14 – 18, Grand Rounds*: The MPRB agrees with the need for continued consultation on the visual impacts of the bridge structures over the Kenilworth Channel from surrounding properties. The MPRB is concerned that the visual impact of the bridges over the Kenilworth Channel from Burnham Road Bridge are not evaluated in the consultation materials. The MPRB recommends that this be included in the consultation.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Trail Transit Project.

Sincerely,



Bruce L. Chamberlain, ASLA
Assistant Superintendent for Planning

cc: Sarah Beimers, Minnesota State Historic Preservation Office

STATE HISTORIC PRESERVATION OFFICE

May 21, 2014

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for continuing consultation on the above project. It is being 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 consultation package you submitted to our office on 18 April 2014. This submittal included:

- Consultation letter dated 18 April 2014
- Table of Potential Effects on Historic Properties
- Photo Log of Historic Properties
- Historic Properties Maps 1-6
- Attachment A: Additional Project Information in the Vicinity of Hopkins M&StL Depot
- Attachment B: Additional Project Information in the Vicinity of Cedar Lake Parkway/Grand Rounds Historic District
- Preliminary Track Drawings: East Segments 1-4

In addition to reviewing these materials, we participated in the Section 106 Consulting Parties meeting held at the Southwest Project Office on 30 April 2014. Thank you for convening all of the consulting parties for this meeting, it was very beneficial. Our comments and recommendations are outlined below.

Archaeological Phase II Evaluation

We concur with your determination that archaeological sites 21HE0436 and 21HE0437 are eligible for listing in the National Register of Historic Places (NRHP) under Criterion D. It is our understanding that your agency will complete additional Phase II investigations at these sites in order to determine site boundaries which will assist in the resolution of potential adverse effects to these sites. We agree with this approach.

Area of Potential Effects Revisions

We have taken into account the various adjustments to the project's area of potential effect (APE) which you have summarized in your letter and are illustrated on the Historic Properties Maps. As you have indicated, one of the most significant adjustments to the project APE is in the location of the new light rail bridge crossings over the Kenilworth Lagoon/Channel. We appreciate the fact that, due to the change in scope for this segment of the project, the APE has been expanded in order to comprehensively apply the criteria of adverse effect to significant characteristics of the historic Grand Rounds. We look forward to continuing consultation regarding potential effects to historic properties in these additional areas.

Preliminary Project Effects Assessments

You have indicated that the assessments of potential effects on historic properties have been determined based upon preliminary project engineering plans and that final adverse effect determinations will be made by the Federal Transit Administration. In general, we agree with many of the assessments that have been completed thus far and it is our opinion that these assessments will provide a basis for provisions to be included in a Section 106 agreement document, perhaps in the form of a programmatic agreement, for the Southwest Light Rail Transit Project. Our comments and recommendations on your April 18th correspondence are outlined below:

- Based on our review of the current preliminary engineering and station area plans, we concur with your determination that the project will not adversely affect the following nine (9) properties: Hopkins City Hall (Hopkins), Hoffman Callan Building (St. Louis Park), Minikahda Club (Minneapolis), Grand Rounds-Lake Calhoun Segment (Minneapolis), Mac Martin House (Minneapolis), Dunwoody Institute (Minneapolis), Minneapolis St. Paul & Manitoba Railroad Historic District (Minneapolis), Osseo Branch/Minneapolis St. Paul & Manitoba Railroad Historic District (Minneapolis), and the Minneapolis Warehouse District (Minneapolis). We agree that no further consultation is required for these properties unless subsequent project plan development results in effects to these historic properties.
- Please Note: Based upon discussions at the April 30th consulting parties meeting, we do not concur with the "no adverse effect" finding for the CM&StP Saint Louis Park Depot (Saint Louis Park), due to the fact that project plans have changed in the vicinity of this historic property which may necessitate additional effect assessment and/or design changes. We look forward to continuing consultation at this location.
- We agree with your agency's determination that avoidance of adverse effects for the following four (4) properties may be possible through appropriate design modifications and/or protection measures during construction: M&StL Hopkins Depot (Hopkins), Peavey-Haglin Experimental Concrete Grain Elevator (Saint Louis Park), Grand Rounds-Cedar Lake Parkway Segment (Minneapolis), and Archaeological Site 21HE0409. We will continue to consult with your agency as project plans are further developed.
- In regards to the proposed location of the two (2) new Lake of the Isles-Cedar Lake Channel Bridges, you have indicated that we will continue to consult with your agency on ways to minimize or avoid adverse effects to the six (6) historic properties identified within the APE for these bridges. These historic properties include: the Kenilworth Lagoon/Channel, Cedar Lake, Lake of the Isles, Lake of the Isles Parkway, and Park Board Bridge No. 4 which are contributing elements to the Grand Rounds, as well as the Lake of the Isles Residential Historic District. We agree that avoidance or minimization of adverse effects is the most desirable outcome, but we

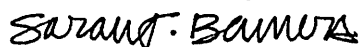
also recommend that continued consideration be given to potential mitigation of any adverse effects resulting from this segment of the project's construction.

- We agree with your recommendation for continued consultation regarding avoidance or minimization of potential adverse effects which may result from construction of the Penn LRT Station. It is our opinion that your agency should continue to consider potential mitigation of adverse effects at this station location as well. We agree that further consideration of effects resulting from the design and development of access routes between the Penn LRT Station and Kenwood Parkway will need to be assessed. The four (4) historic properties located within the Penn LRT Station APE include: the Kenwood Parkway Historic District, and three contributing elements to the Grand Rounds which include Kenwood Parkway, Kenwood Park, and Kenwood Water Tower. You have also indicated that additional assessment of potential auditory effects will be completed for the northern section of the Kenwood Parkway Historic District.
- We will continue to consult with your agency and consulting parties in the City of Hopkins regarding continued assessment of potential effects to the Hopkins Commercial Historic District resulting from the Downtown Hopkins LRT Station area development. We agree that a provision for listing the historic district in the National Register of Historic Places is an acceptable strategy for avoiding adverse effects and look forward to continuing consultation with your agency and the City of Hopkins.
- We agree with your determination that archaeological sites 21HE0436 and 21HE0437 will be directly affected by construction of the Royalston LRT Station and that avoidance of adverse effects has been considered and deemed infeasible. Therefore, we need to further consult regarding minimizing or mitigating for the adverse effect. Perhaps through the additional archaeological survey which is to be completed in the near future. The boundaries of these sites will be clarified which may allow for avoidance of direct impacts and continued preservation of site elements. We agree that a logical mitigation strategy for destruction of these sites will be a provision in a future agreement document for Phase III Data Recovery. We also recommend continued consultation with our office and consulting parties from the City of Minneapolis to develop additional relevant mitigation strategies.
- We agree with your determination that impacts to the following four (4) non-contributing elements, either directly or indirectly, will not adversely affect the Grand Rounds: the two (2) Railroad Bridges over Kenilworth Lagoon, the Burnham Road Bridge, and The Parade.

Again, thank you for your agency's efforts in bringing all of the Section 106 consulting parties together on April 30th to discuss the preliminary effects assessments, the proposed light rail route from Hopkins to Minneapolis, as well as providing a project update regarding the proposed Lake of the Isles-Cedar Lake Channel Bridges. We are aware of the fact that your agency will be in receipt of comment letters from the various consulting parties regarding the preliminary effects assessments and we look forward to continuing consultation as all comments and recommendations are taken into account.

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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance



Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

E-Mail: dennis.gimmestad@state.mn.us

2 June 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Comments on April 2014 Consultation on Project Effects, SHPO #2009-0080

Dear Ms. Beimers:

Thank you for your comments of 21 May 2014 on the consultation materials we submitted to you on 18 April 2014. We appreciated your participation and the participation of all the Section 106 consulting parties at the 30 April 2014 consultation meeting at the Southwest Project Office, and we are glad that you found the discussion helpful.

We are writing to provide some clarification on two items discussed in your letter.

- We do intend to complete additional Phase II investigations in the vicinity of archaeological sites 21HE0436 and 21HE0437. As you know, we have determined these sites to be eligible to the National Register of Historic Places (NRHP), and we propose to complete a Phase III data recovery as mitigation for effects to the sites. The additional Phase II work is needed to better define the site boundaries before the Phase III work is done. Because the area of the Phase II work lies under Royalston Avenue, we intend to complete the Phase II work, finalize the site boundaries, and complete the Phase III work as part of a comprehensive effort, when full access to the area is available. We would anticipate a plan for this work will be developed as part of the 106 Agreement for the project. We also acknowledge your interest in assuring that the data recovery at these sites is developed within the context of similar historic archaeological sites in Minneapolis, to better focus this and other future investigations.

- Regarding your comments on potential effects from project construction near the CM&StP Depot in St. Louis Park, we will shift the depot from the group of properties which require no further review (unless plans are modified) to the group of properties which require further consultation as project planning moves forward (see our 18 April 2014 consultation letter). The latter group also includes the M&StL Hopkins Depot, the Peavey-Haglin Grain Elevator, Grand Rounds-Cedar Lake Parkway, and Archaeological Site 21HE0409. The intent with the latter group is to avoid adverse effects through consultation on design and/or protective measures, pursuant to stipulations to be included in the 106 Agreement.

We look forward to working with you in continuing the Section 106 review of this project. If you have any questions or concerns, please contact Greg Mathis of our office at 651-366-4292.

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Katie Walker, Hennepin County
Greg Mathis, MnDOT CRU

Section 106 Consulting Parties:

Jack Byers, Minneapolis Community Planning and Economic
Development
Brian Schaffer, Minneapolis Heritage Preservation Commission
Jennifer Ringold, Minneapolis Park and Recreation Board
Jeanette Colby, Kenwood Isles Area Association
Meg McMonigal, City of St. Louis Park
Nancy Anderson, City of Hopkins
Elise Durbin, City of Minnetonka
Regina Rojas, City of Eden Prairie
Bill Walker, Three Rivers Park District

STATE HISTORIC PRESERVATION OFFICE

June 5, 2014

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for continuing consultation on the above project. It is being 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 additional transit project materials received in our office on 8 May 2014 which included:

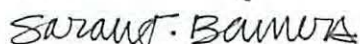
- Correspondence letter dated 8 May 2014
- Report entitled *Phase I/Phase II Architectural History Investigation, Southwest LRT Project, Hennepin County, Minnesota: Volume Six, Supplemental Report Number Three (SDEIS)* (CH2M HILL, April 2014)
- Report entitled *Phase 1a Archaeological Investigation: Southwest Light Rail Transit, Hennepin County, Minnesota: SDEIS Areas Eden Prairie Segment, Hopkins Operations and Maintenance Facility, St. Louis Park/Minneapolis Segment* (CH2M HILL, March 2014)

You have indicated that these additional cultural resources studies have been completed as a result of scope adjustments which have been made to the proposed light rail transit project and that a Supplemental Draft Environmental Impact Statement (SDEIS) is currently being finalized.

Based upon information provided to us at this time, we concur with your determination that, in the SDEIS project areas surveyed for architecture/history resources, no additional properties listed or eligible for listing in the National Register of Historic Places (NRHP) were identified. Also, we concur with the determination that Phase 1 archaeological surveys should be completed for Areas A, B, and C identified in the Phase 1a archaeological report and that outside these three (3) areas targeted for survey, there are no additional NRHP listed or eligible properties identified.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

STATE HISTORIC PRESERVATION OFFICE

June 5, 2014

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

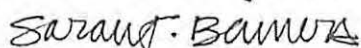
Thank you for continuing consultation on the above project. It is being reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, and to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We have completed our review of your correspondence dated 2 April 2014 in which you provide clarification regarding the historic property boundaries for segments of the Grand Rounds and the M&StL RR Depot, properties previously determined eligible for listing in the National Register of Historic Places and located within the area of potential effects (APE) for the Southwest Light Rail Transit Project. Our comments are summarized below:

- **Grand Rounds-Kenilworth Lagoon/Channel (HE-MPC-1822)** – we concur with your determination of the historic property boundary as described in your correspondence and illustrated on the map dated 02/13/14;
- **Grand Rounds-Cedar Lake Parkway (HE-MPC-1833)** – we concur with your determination of the historic property boundary as described in your correspondence and illustrated on the map dated 02/13/14;
- **M&StL RR Hopkins Depot (HE-HOC-0014)** – we concur with your determination of the historic property boundary as described in your correspondence and illustrated on the map dated 02/13/14.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

STATE HISTORIC PRESERVATION OFFICE

July 3, 2014

Mr. Dennis Gimmestad
MnDOT Cultural Resources Unit
Transportation Building, MS620
395 John Ireland Boulevard
St. Paul, MN 55155

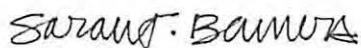
Re: Southwest Transitway Project
Eden Prairie, Minnetonka, Edina, Hopkins, St. Louis Park & Downtown Minneapolis
Hennepin County
SHPO Number: 2009-0080

Dear Mr. Gimmestad:

Thank you for your letter of 2 June 2014 that provided clarification on additional Phase II investigations in the vicinity of archaeological sites 21HE0436 and 21HE0437 and clarification on the properties that will require further consultation on design and/or protective measures to avoid adverse effects as project planning moves forward.

We look forward to continuing consultation on this project. Please feel free to contact me at 651-259-3456 or sarah.beimers@mnhs.org if you have any questions or concerns regarding our review.

Sincerely,



Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Greg Mathis, MnDOT CRU



Minnesota Department of Transportation

Office of Environmental Stewardship
Mail Stop 620
395 John Ireland Boulevard
Saint Paul, MN 55155

Office Tel: (651) 366-4292
Fax: (651) 366-3603
greg.mathis@state.mn.us

September 26, 2014

Jennifer Ringold
Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411

RE: Kenilworth Lagoon Draft Historic Context, History, and Physical Description Report

Dear Jennifer:

Following up on the presentation made during the 30 April 2014 consulting parties meeting, we have completed the draft report on the history and physical character of the Kenilworth Lagoon. The document includes a historic context, history of the lagoon, and detailed physical description of the lagoon/channel. It also incorporates the material included in Bruce Chamberlain's letter of 16 May 2014, commenting on the 18 April 2014 consultation package.

We are planning to provide a copy of this document to all consulting parties for review as part of our continued Section 106 consultation for the Southwest Light Rail Transit (LRT) Project. Per our previous conversation, since Park Board staff have an intrinsic knowledge of this resource, we would like to provide you with an opportunity to complete a courtesy review in advance to ensure that the document is as comprehensive and as accurate as possible. Since this is a courtesy review, any comments provided at this time will not preclude the MPRB from providing official comments as a consulting party when the final document is provided to all consulting parties for review and comment. We request that you provide any comments you may have to me by 15 October 2014.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Mathis', written over a light blue background.

Greg Mathis
Cultural Resources Unit

Enclosures: CD containing draft report

cc: Nani Jacobson, Southwest LRT Project Office

An Equal Opportunity Employer





Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

Office Tel: (651) 366-4292

Fax: (651) 366-3603

greg.mathis@state.mn.us

October 3 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase I
Archaeological Survey: Eden Prairie Segment Area C, SHPO #2009-0080

Dear Ms. Beimers,

We are writing to continue consultation regarding the identification of historic properties for the Southwest Light Rail Transit Project. Following standard practice, all Section 106 consulting parties for the project are copied on this letter.

Enclosed is a report on a Phase I archaeological survey completed by The 106 Group Ltd. (September 2014) for an area that will be included in the upcoming Supplemental Draft Environmental Impact Statement (SDEIS). The Phase I survey was based on the results of the Phase 1a investigation conducted for the SDEIS and reported in *Phase 1A Archaeological Investigation, Southwest Light Rail Transit, Hennepin County, Minnesota: SDEIS Areas: Eden Prairie Segment, Hopkins Operations and Maintenance Facility, and St. Louis Park/Minneapolis Segment* (The 106 Group Ltd., March 2014) that was submitted to your office for review on May 8, 2014. The Phase 1a investigation recommended field survey of three areas within the Eden Prairie segment. A Phase I survey has been completed for one of these areas, Area C, and the results are presented in the enclosed report. Based on the findings of this Phase I survey, we have determined that Area C is not eligible for the National Register of Historic Places and request your concurrence. Please submit any comments on the report within 30 days of this letter.

The two other areas recommended for field investigation in the SDEIS Phase 1a report, Areas A and B, are expected to be surveyed before the end of the 2014 field season and the results will be submitted under separate cover.

We look forward to continuing to consult with your office as project planning moves forward. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Mathis'.

Greg Mathis
MnDOT Cultural Resources Unit

Enclosures: One (1)

cc (via email):

Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Katie Walker, Hennepin County

Section 106 Consulting Parties:

Regina Rojas, City of Eden Prairie
Nancy Anderson, City of Hopkins
Brian Schaffer, City of Minneapolis
John Byers, City of Minneapolis
Elise Durbin, City of Minnetonka
Meg McMonigal, City of St. Louis Park
Kathy Low, Kenwood Isles Area Association
Jennifer Ringold, Minneapolis Park and Recreation Board
Bill Walker, Three Rivers Park District



Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

Office Tel: (651) 366-4292

Fax: (651) 366-3603

greg.mathis@state.mn.us

October 13, 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; comments received in response to April 2014 consultation on project effects, SHPO #2009-0080

Dear Ms. Beimers,

We are writing to continue our consultation regarding the Southwest Light Rail Transit (LRT) project. First, let me thank you for your participation at the Section 106 consulting parties meeting held on 30 April 2014 and for your comments of 21 May 2014 regarding this meeting and the consultation materials submitted on 18 April 2014. Subsequent to the consulting parties meeting, we received additional comments from the City of Minneapolis (City) and the Minneapolis Park and Recreation Board (MPRB), which are summarized below. Since other Section 106 consulting parties were not copied on these communications, we are submitting them to your office and copying all Section 106 consulting parties so that everyone has the same materials. No response is required.

On 16 May 2014 the City provided comments indicating that it would be premature for the City to provide separate comments under Section 106 prior to its decision as part of the municipal consent process (Attachment A). While not required by NEPA or Section 106, municipal consent is a process established by Minnesota Statute 473.3994, whereby the governing body of each statutory and home rule charter city, county, and town in which a LRT route is proposed to be located is provided an opportunity to review the preliminary design plans and either approve or disapprove the plans for the route to be located in the city, county, or town. A local unit of government that disapproves the plans must also describe specific amendments to the plans that, if adopted, would cause it to withdraw its disapproval. The City approved municipal consent for the project on 29 August 2014, but has not provided any comments under Section 106 since that time.

On 18 May 2014 the MPRB issued comments pertaining to potential effects to several National Register eligible properties in Minneapolis (Attachment B). Specific comments were provided on three properties, all of which are contributing resources to the National Register eligible Grand Rounds Historic District (XX-PRK-001):

- Lake Calhoun (HE-MPC-01811)
 - Concerned about potential impacts from changes in traffic and parking patterns related to the West Lake Station; and
 - Request for continued consultation through final design of new and/or improved access routes to the station to achieve no adverse effect from traffic and parking changes.
- Cedar Lake Parkway (HE-MPC-01833)
 - Concerned about long-term noise and visual effects at the intersection of the project and this resource;

- Impacts to adjacent park land; and
- Request for continued consultation on potential effects to this resource.
- Kenilworth Lagoon/Channel (HE-MPC-1822)
 - Concerns:
 - Size and scale of the proposed new bridge structures crossing over the lagoon/channel and their inconsistency with the design intent and historic cultural landscape of the channel;
 - Visual impacts of tunnel portals on each side of the channel
 - Noise and vibrations from LRT vehicles entering/exiting the tunnels; and
 - May not be possible to mitigate impacts of new bridges.
 - Request continued consultation to further consider potential impacts to the lagoon/channel.

The MPRB also requested continued consultation related to the potential impacts of the new bridge structures over the Kenilworth Lagoon/Channel to five National Register eligible properties:

- Cedar Lake (Grand Rounds) (HE-MPC-1820)
- Lake of the Isles (Grand Rounds) (HE-MPC-1824)
- Lake of the Isles Parkway (Grand Rounds) (HE-MPC-1825)
- Park Board Bridge No. 4 (Grand Rounds) (HE-MPC-6901)
- Lake of the Isles Residential Historic District (HE-MPC-9860)

The Federal Transit Administration (FTA) and the Minnesota Department of Transportation Cultural Resources Unit, as designated authority by FTA, will take these comments, as well as those provided by your office, into account as Project planning moves forward. We look forward to continuing to consult with your office to consider potential effects to these and other listed and eligible historic properties as Project planning moves forward.

Sincerely,



Greg Mathis
MnDOT Cultural Resources Unit

Enclosures: Two (2)

cc (via email): Maya Sarna, Federal Transit Administration
 Bill Wheeler, Federal Transit Administration
 Nani Jacobson, Metropolitan Council
 Caroline Miller, Metropolitan Council
 Katie Walker, Hennepin County
 Regina Rojas, City of Eden Prairie
 Nancy Anderson, City of Hopkins
 Brian Schaffer, City of Minneapolis
 John Byers, City of Minneapolis
 Elise Durbin, City of Minnetonka
 Meg McMonigal, City of St. Louis Park
 Kathy Low, Kenwood Isles Area Association
 Jennifer Ringold, Minneapolis Park and Recreation Board
 Bill Walker, Three Rivers Park District

ATTACHMENT A

From: [Byers, Jack P.](#)
To: [Gimmestad, Dennis \(DOT\)](#)
Cc: sarah.beimers@mnhs.org; [Jacobson, Nani \(Nani.Jacobson@metrotransit.org\)](mailto:Nani.Jacobson@metrotransit.org); [Hager, Jenifer A](#); [Schaffer, Brian C.](#)
Subject: Southwest LRT 106 Consultation - Your request for comments from Minneapolis by May 18th
Date: Friday, May 16, 2014 11:02:32 AM

Dennis,

Thank you for convening all of the consulting parties on the Southwest Transitway Section 106 process on April 30th. We appreciate your presentation of the updated Potential Effects table and we appreciate the research and chronology that the 106 Group presented during that meeting. Both were illuminating and very helpful. Thank you for your hard work on this project.

As you are aware, the City of Minneapolis and the other municipalities along the proposed corridor are currently engaged the Municipal Consent process; one that includes a specific set of proposals from SPO. City of Minneapolis staff are reviewing the SPO package and preparing our comments for subsequent review and consideration by our City Council. City staff are certainly keeping matters related to historic resources in mind as we conduct our Municipal Consent review. However, given that the Municipal Consent process is formally underway, it would be premature for us to comment specifically on 106 matters separately and before our City Council's review and decision on Municipal Consent is completed.

Thank you for understanding. Please feel free to contact me if you have any questions or require further clarification.

Regards,
Jack Byers

Jack Byers, AICP

Long Range Planning Manager

City of Minneapolis – Community Planning and Economic Development

105 Fifth Avenue South – 200
Minneapolis, MN 55401-2534

Office: 612-673-2634

jack.byers@minneapolismn.gov

www.minneapolismn.gov/cped



ATTACHMENT B



Minneapolis Park & Recreation Board

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax:
612-230-6500

www.minneapolisparkeboard.org

President
Liz Wielinski

Vice President
Scott Vreeland

Commissioners
Brad Baum
John Erwin
Meg Forney
Steffanie Musich
Jon C. Olson
Anita Tabb
M. Annie Young

Superintendent
Jayne Miller

Secretary to the Board
Pamela French



May 16, 2014

Dennis Gimmestad
MNDOT Cultural Resources Unit
Office of Environmental Stewardship
Mail Stop 620
395 John Ireland Boulevard
Saint Paul, MN 55155

RE: Southwest Light Rail Transit Project, Minneapolis Park and Recreation Board Comments on April 18, 2014 Consultant Materials

Dear Mr. Gimmestad:

Thank you for the opportunity to review the Section 106 materials provided to Sarah Beimers of the Minnesota State Historic Preservation Office and to participate in the April 30, 2014 consultant meeting for the Southwest Light Rail Transit (SWLRT) Project. Minneapolis Park and Recreation Board (MPRB) staff provide the following comments on the materials:

Table of Potential Effects on Historic Properties (4/15/14)

- 1) *No 8, Grand Rounds/Lake Calhoun (eligible) HE-MPC-01811:* No adverse effect is indicated for this portion of the Grand Rounds Historic District based on preliminary engineering and station area plans. This property is close to the station area in an area of the city that has poor vehicle, pedestrian and bicycle circulation. The MPRB is concerned that this property will be adversely impacted by changes to traffic and parking patterns that result from the SWLRT project in this area. We request continued consultation on this property throughout the final design and development of the SWLRT, similar No 21, Grand Rounds/Kenwood Parkway (eligible) HE-MPC-01796 in the table.
- 2) *No 9, Grand Rounds/Cedar Lake Parkway (eligible) HE-MPC-01833:* The MPRB is concerned about the long-term noise and visual intrusion at this intersection and its impacts on adjacent park land. We understand this it is currently a quiet zone. We also understand that this status is unique and are concerned that this designation may not carry over into the SWLRT project. The MPRB is welcomes the opportunity to continue the consultation on this intersection.
- 3) *No 13, Grand Rounds/Kenilworth Lagoon/Channel (eligible) HE-MPC-1822:* The MPRB agrees with the need for continued consultation on the impacts to the Kenilworth Channel and Lagoon. The size and scale of the proposed bridge structures are not consistent with the design intent and historic cultural landscape of the channel. The MPRB would

like to include the introduction of massive portals on each side of the channel to this review, as well as the noise and vibration impacts that will result from the SWLRT moving in and out of the shallow tunnels and crossing the channel. The MPRB is concerned that it will not be possible to mitigate the impacts of bridge structures and portals that co-locate freight, light rail and trail over the channel. To assist with defining the design intent and historic landscape character of the Kenilworth Channel and Lagoon, the MPRB provides the following information:

The creation of the Kenilworth Lagoon was driven by rising interest in “water sports of all kinds on the lakes and streams,” according to Theodore Wirth, writing in his 1944 history of the park system. As early as 1906, Wirth’s first year as superintendent, one of his main goals was to connect Isles, Calhoun, Cedar, and Brownie together, an idea called the “Venice of America”—with specific reference to the “beautiful drives and bridges”—in the 1908 Board President’s Report.

Excavation of the Kenilworth Lagoon as far as the Minneapolis and St. Louis Railroad was completed in 1911 and extended to Cedar Lake by 1913. In his 1914 Superintendent’s Report, Wirth notes the adoption of the name “Kenilworth Lagoon” for the entire water connection between Isles and Cedar, and describes its original design:

“During the winter season the grounds along the south shore of the lagoon, between Bridge No. 4 [Lake of the Isles Parkway over the Kenilworth Lagoon] and the railroad, were graded, and in the spring seeded and planted, and they have become very attractive in their new garb of lawn and shrubbery. During the fall months the north side of the main lagoon and the banks of the waterway between the railroad bridge and Cedar Lake have also been graded, dressed with loam, planted, and seeded. Walks along both shores have been established leading from Lake of the Isles Boulevard to Cedar Lake Avenue, or what is now called ‘Burnham Avenue.’ Pipe rails were erected along the walks where they come close to the narrow channel under the railroad bridge.

This work was completed less than a year after similar planting and grading was done around Lake of the Isles and along the channel between Isles and Calhoun. Wirth viewed the dredging and interconnection of the four lakes as a single grand project with similar design parameters. In 1907 he envisioned that the Isles-Calhoun connection would have a “natural picturesque appearance.” This design style would have been applied to the entire chain of lakes.

The interconnection of the lakes required six bridges, which were enumerated in the 1909 Annual Report. A competition was held to design them, and designs were selected and built over the Lake Calhoun inlet (bridge #1), Lake of the Isles outlet to Calhoun (bridge #3), and the Kenilworth Lagoon at Lake of the Isles (bridge #4). The railroad bridge over the Isles-Calhoun channel (bridge #2) was built by the railroad. These four bridges were completed in 1911. A design was purchased for the Burnham Road (then

“Cedar Lake Avenue”) bridge (bridge #6) but it was never built. Bridge #5, the railroad bridge over the Kenilworth Lagoon at the present day location of the proposed Southwest LRT crossing, was completed in 1913 and considered temporary.

Though in 1909 Wirth agreed to focus efforts and money on the more prominent Bridges 1, 3, and 4, by 1913 he “[hopes that the railroad company will replace [the temporary timber structure] in due time with a better and safer structure.” In 1916, two years after completion of the Kenilworth Lagoon with its plantings and trails, the railroad bridge continued to bother Wirth: “I wish to renew my suggestion that the city be requested to build a suitable permanent bridge across the channel on Cedar Lake Avenue (Burnham Road), and that the Minneapolis and St. Louis Railway Company replace the unsightly wooden bridge with a permanent, neat looking concrete structure.”


The Kenilworth Lagoon was originally envisioned as a recreational water and pedestrian connection in the picturesque style that predominated throughout the Isles/Calhoun area. All the bridges in the area—including the railroad bridges—were considered key features of that recreational connection. In the 1914 Annual Report, Wirth sets forth his grand vision specifically for the Kenilworth Lagoon:

“After permanent ornamental bridges have been established to replace the present unsightly wooden structures [of the Burnham Road and Minneapolis and St. Paul Railroad bridges], this waterway between the two lakes will be one of the most attractive features of the entire park system, viewed alike from land or water.”

- 4) *No 14 – 18, Grand Rounds*: The MPRB agrees with the need for continued consultation on the visual impacts of the bridge structures over the Kenilworth Channel from surrounding properties. The MPRB is concerned that the visual impact of the bridges over the Kenilworth Channel from Burnham Road Bridge are not evaluated in the consultation materials. The MPRB recommends that this be included in the consultation.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Trail Transit Project.

Sincerely,



Bruce L. Chamberlain, ASLA
Assistant Superintendent for Planning

cc: Sarah Beimers, Minnesota State Historic Preservation Office



Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

Office Tel: (651) 366-4292

Fax: (651) 366-3603

greg.mathis@state.mn.us

October 17, 2014

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Adjustments to the Area of Potential Effect, SHPO #2009-0080

Dear Ms. Beimers,

We are writing to continue our consultation for the Southwest Light Rail Transit (LRT) Project (Project). This submittal includes materials related to revisions to the Project area of potential effect (APE). Following standard practice, all Section 106 consulting parties for this undertaking are copied on this letter.

The Project's research design for cultural resources, which was submitted to your office for review and concurrence in 2010, established parameters for the APE. Since the Project was in the early planning stages at that time, and many details were not known, the research design identified general APE limits for both archaeological and architecture/history resources. The research design noted that both would require periodic reevaluation as more detailed engineering plans were developed. Following this directive, the APEs for both archaeological and architecture/history resources have been periodically reevaluated and adjusted as necessary to account for potential effects to historic properties. Your office has been consulted on these revisions, the last of which were documented in our submittal of 18 April 2014 and to which your office concurred on 21 May 2014. Since that time, Project planning has advanced considerably, culminating in the completion of 30 percent plans (Preliminary Plans) in September 2014.

The Preliminary Plans represent a major milestone, providing a level of detail that was heretofore not available. They also include a number of Project adjustments, several of which were required by a memorandum of understanding (MOU) between the Metropolitan Council and the City of Minneapolis (Attachment A). The MOU required removing the LRT tunnel north of the Kenilworth Channel/Lagoon crossing from the Project; reinstating the 21st Street Station (this station was originally included in the Project but was later dropped per our letter of 08 May 2014); and the addition of pedestrian-access, noise mitigation, landscape restoration and other improvements along the Project in Minneapolis. Therefore, as delegated authority by the Federal Transit Administration (FTA), and in accordance with the research design, the Minnesota Department of Transportation Cultural Resources Unit (MnDOT CRU) has reviewed the Preliminary Plans and reevaluated the APEs for archaeological and architecture/history resources. As a result, we have made a number of revisions to both APEs to account for minor adjustments in the Project alignment; slight shifts in station locations; station area infrastructure extending more than 500 feet (archaeology) or 0.25 miles (architecture/history) from station center points; Project related roadway, bicycle and pedestrian improvements; and potential barrow and fill and floodplain mitigation areas.

The revised APE for archaeological resources includes 100 feet on either side of the centerline of the adjusted corridor alignment and a 500-foot radius around the central point of proposed station construction. For Project components extending beyond these limits, the APE has been adjusted in accordance with the research design to include the limits of disturbance (LOD) shown on the Preliminary Plans. To provide more flexibility for potential Project alterations that may be identified as planning advances, all areas included in the APE established in April 2014 that are outside the LOD identified on the Preliminary Plans remain in the APE (Attachment B).

The APE for architecture/history resources has been revised to account for Project elements and effects that extend beyond the previously defined APE (Attachment C). The parameters for the architecture/history APE outlined in the Project research design require that APE be assessed periodically to determine if it needs to be expanded; however, they do not provide parameters for establishing limits to account for effects beyond 300 feet of the alignment or 0.25 miles of a station. Therefore, MnDOT CRU, pursuant to its FTA delegated authority, has established additional parameters for the APE for architecture/history resources (Attachment D). The purpose of these supplemental parameters is to provide guidance for revising the APE to account for common types of Project elements and effects that may extend beyond 300 feet on either side of the project corridor and/or more than 0.25 miles from the center point of a station. These parameters were used to make the current revisions to the APE for architecture/history resources and will be used, as needed, to reevaluate and revise the APE as Project planning continues to advance.

Many of the areas added to the revised APEs have already been surveyed for the Project. Within these previously surveyed areas there are three historic properties. All are within the APE for the reinstated 21st Street Station. These include one listed property and two eligible resources:

- Frieda and Henry J. Neils House (HE-MPC-6068; listed), 2801 Burnham Blvd., Minneapolis;
- Mahalia and Zacharia Saveland House (HE-MPC-6766; eligible), 2405 W. 22nd St., Minneapolis; and
- Frank and Julia Shaw House (HE-MPC-6603; eligible), 2036 Queen Ave. S., Minneapolis.

The Project will be conducting additional supplemental archaeological and architecture/history surveys of previously unsurveyed portions of the revised APEs to determine if there are any historic properties that are listed in or are eligible for inclusion in the National Register. As these surveys are completed, we will consult with your office regarding the results and to consider potential effects to listed or eligible historic properties.

In closing we request you provide any comments on the revised APEs and the supplemental parameters for the architecture/history APE within 30 days of this letter.

Sincerely,



Greg Mathis
MnDOT Cultural Resources Unit

Enclosures: Four (4)

- Attachment A: Memorandum of Understanding, Proposed Redesign of a Portion of Southwest Light Rail Transit Project.
- Attachment B: Southwest Light Rail Transit Project Section 106 Archaeological APE Revisions, dated 10/8/2014.

- Attachment C: Southwest Light Rail Transit Project Section 106 Architecture/History APE Revisions, dated 10/15/2014.
- Attachment D: Southwest Light Rail Transit Project Research Design for Cultural Resources: Supplement Number 1, Additional Parameters for the Area of Potential Effect for Architecture/History Resources, dated 10/14/2014.

cc: Maya Sarna, Federal Transit Administration
Bill Wheeler, Federal Transit Administration
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
Katie Walker, Hennepin County
Regina Rojas, City of Eden Prairie
Nancy Anderson, City of Hopkins
Brian Schaffer, City of Minneapolis
John Byers, City of Minneapolis
Elise Durbin, City of Minnetonka
Meg McMonigal, City of St. Louis Park
Kathy Low, Kenwood Isles Area Association
Meghan Elliott, Preservation Design Works/Kenwood Isles Area Association
Jennifer Ringold, Minneapolis Park and Recreation Board
Bill Walker, Three Rivers Park District

ATTACHMENT A

MEMORANDUM OF UNDERSTANDING

Proposed Redesign of a Portion of Southwest Light Rail Project

This Memorandum of Understanding is between the City of Minneapolis (City) and the Metropolitan Council (Council).

After lengthy discussions, the City and the Council have reached an understanding of how certain changes to the Preliminary Design Plan of the Southwest Light Rail Project (Project) within the City of Minneapolis would render the Project more acceptable to the City. In consideration of the mutual agreements set forth herein, the Parties agree as follows:

1. Upon approval by the Council, it will finalize certain design plan changes, as set forth in Exhibit 1 attached hereto. Among the design plan changes is the elimination of the North shallow tunnel and the addition of an at-grade station at 21st Street. These two changes will result in a net savings of approximately \$60 million for the Project.
2. Fifty percent of the net savings realized from the changes in paragraph 1 above (\$30 million) will be available to meet the City's proposed physical design changes. The remaining 50 percent will be used to reduce the overall budget of the project. Improvements requested by the City that fall outside the allotted 50 percent will be considered along with other contingency funding requests as the project progresses.
3. It is understood that the proposed design plan changes are subject to acceptance for funding by the Federal Transit Administration.
4. Upon approval by the Council of this MOU and the revised preliminary design plan reflecting the changes set out herein, the municipal approval process set forth in Minnesota Statutes Section 473.3994 as applied to the City will commence again from the beginning of that process. Since the design plan changes contemplated in this MOU do not involve any other municipality, amendments to the Minneapolis portion of the Project, is not intended to change the approval process or timeline already underway for other municipalities.

Metropolitan Council
Regional Administrator

Date: _____

City of Minneapolis

Date: _____

Exhibit 1

Amendments to the preliminary design of the SWLRT Corridor in Minneapolis

The following changes are each subject to the eligibility of federal transit funding.

1. The tunnel south of the water channel will be built as indicated in the current municipal consent package.
2. The tunnel north of the water channel will be removed and a station will be added at 21st Street. The 21st Street Station will include pedestrian connections to Cedar Lake. Light rail trains will operate at-grade on a bridge over the Kenilworth Channel and at grade north of the channel.
3. The parties agree that the Kenilworth Corridor (Corridor) is located in a park-like setting. In the event that LRT is constructed in the Corridor with co-location of LRT, freight rail and a bicycle and pedestrian trail, the Corridor shall be designed to a park-like level of amenity, not only restoring, but improving pre-existing conditions. Design and restoration shall include but not be limited to native plantings, mature trees and the like. It is understood that the Corridor, along with the bicycle and pedestrian paths located on the Corridor, is a significant part of the City's chain of lakes park system, one of the most prized, highly used recreational attractions in the region and that the parties intend for the Corridor to be landscaped and restored so that it continues to be an asset to the chain of lakes park system. It is agreed that the Corridor shall be restored and constructed consistent with this park-like environment and the proximity to the chain of lakes, to the extent reasonably possible, so as not to impact neighboring parks or water bodies or to impair the existing park-like setting. The Council will select a landscape architect with the City and MPRB serving on the evaluation panel. The City, MPRB and representatives of the affected neighborhoods will participate with the Council in a collaborative design process for the Corridor.
4. Noise mitigation will be added based on the Supplemental Draft Environmental Impact Statement.
5. Add freight rail safety improvement recommendations made by the TranSystems Freight Rail Report as follows:
 - a. Freight Rail guardrail from north of West Lake Station to Cedar Lake Parkway
 - b. Freight guardrail from north of Kenilworth Channel crossing to Burnham Road
 - c. Freight guardrail from west 21st Street to 1,000 feet north of West 21st Street
6. Royalston Station

- a. Upgrade to embedded track along Royalston Avenue both north and south of the station.
- b. Upgrade to painted tubular overhead catenary poles in Royalston Station area and at station.
- c. Build enhanced pedestrian connections to the Farmer's Market, from both the north and south, via the frontage road and Holden and Border Avenues.

7. Van White Station

- a. Dunwoody Blvd sidewalk improvements including improvements to the under-bridge area and intersection improvements at Stadium Pkwy/Emerson Ave S.
- b. Build a pedestrian bridge to Bryn Mawr Meadows.

8. Penn Station

- a. Improve and enhance pedestrian connections from the Penn Ave station across I-394 and north to Mount View Ave.
- b. Additional ADA compliance improvements to be made at each intersection along Penn continuing north to Cedar Lake Road.
- c. Build additional sidewalks, as enhanced pedestrian connections, along the south side of Wayzata Blvd from I-394 pedestrian bridge at Thomas Ave east to the access to Penn Ave station.
- d. Light and sign the existing trail segment from Cedar Lake Trail to Kenwood Parkway.

9. West Lake Station

- a. Build enhanced pedestrian connections along West Lake Street between Drew Ave S and Market Plaza and along Excelsior Blvd between Market Plaza and W 32nd St.
- b. Realign Abbott Ave and Chowen Ave to accommodate development on the HCRRA property as shown the Transitional Station Area Action Plan (TSAAP)

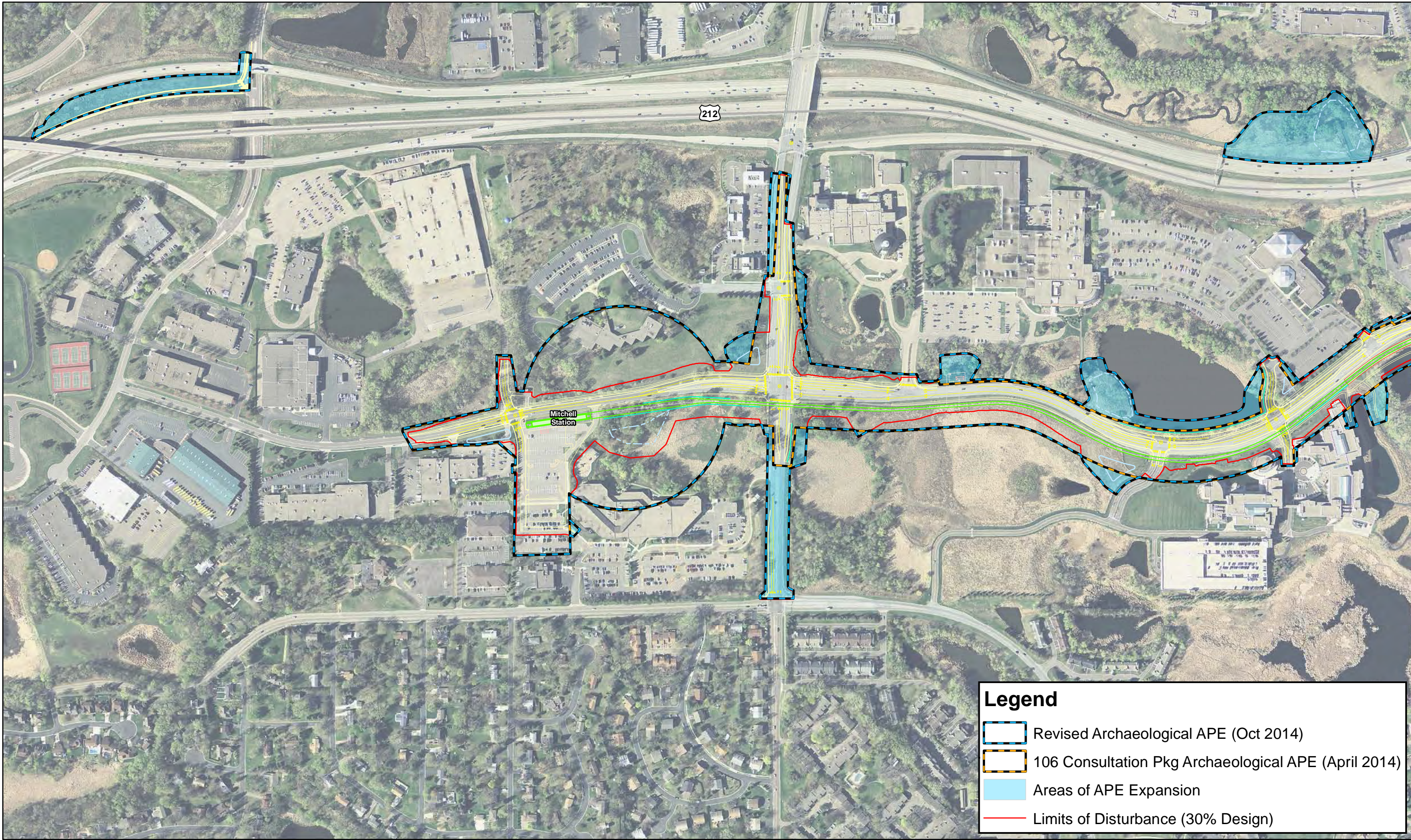
and build “Mid-Town Station” ready.

- c. Build enhanced pedestrian connections along Chowen and Abbott Aves and along the newly realigned street segment.
- d. Conduct an areawide traffic study with partner agencies to assess non-motorized needs and opportunities.





10. Other

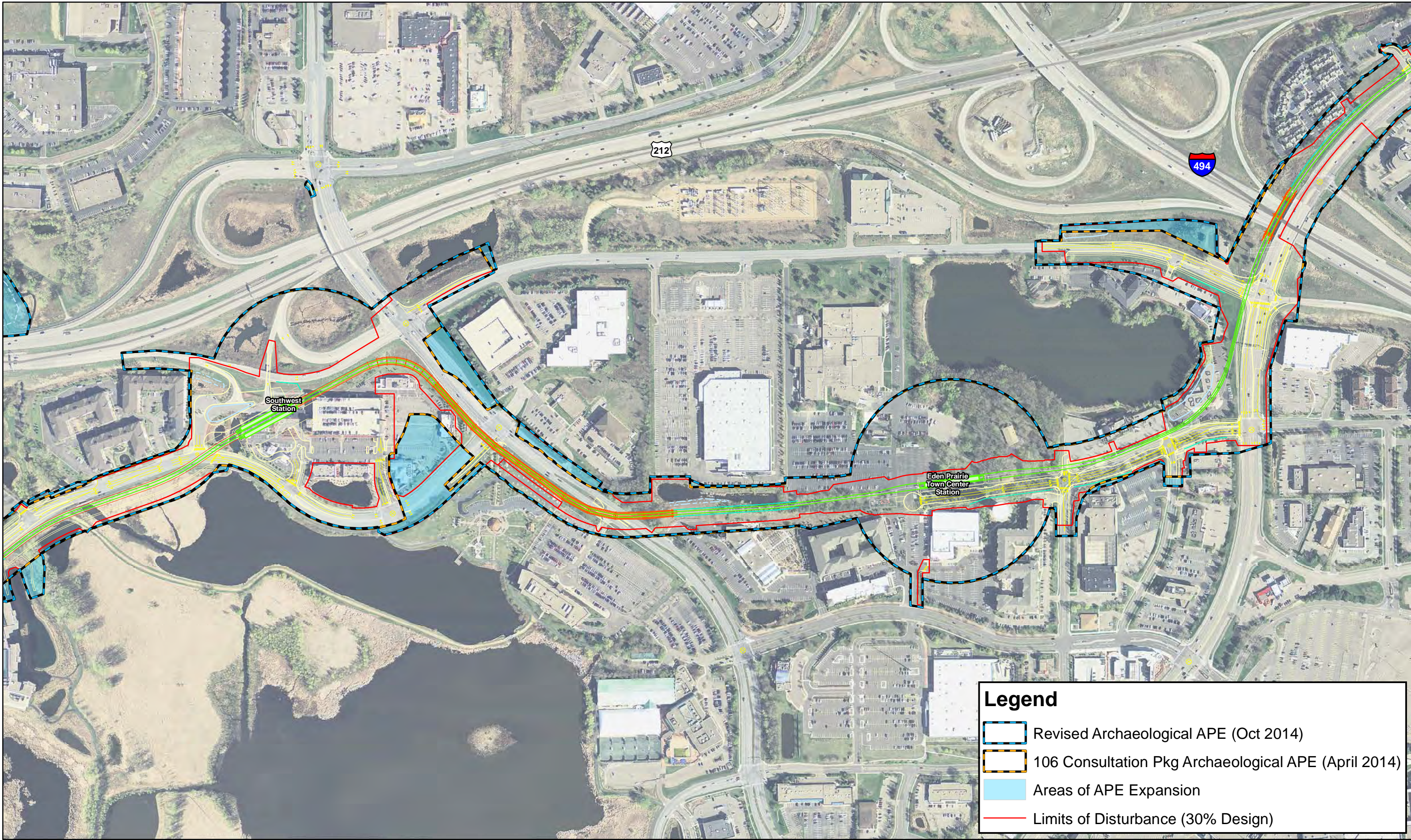
- a. Bicycle and pedestrian facilities, to be determined, within three miles of LRT stations to provide the level of access for transit dependent populations who cannot use Park and Ride facilities.
 - Improvements shall include:
 - i. Closing a trail gap along Van White Boulevard/Fremont Ave N between Van White Memorial Blvd and 2nd Ave N.
 - ii. Work with City and MPRB staff to redesign the connection of the Cedar Lake Trail and Kenilworth Trail near the Penn Ave station for a more functional connection.
 - iii. Add a “trail actuated signal” or some form of traffic control at the intersection of Cedar Lake Road and the Kenilworth Trail.
 - iv. Connection to “Hidden Beach” from 21st St Station including a wayfinding kiosk and wayfinding to the Beach, Franklin Ave and Lake of the Isles.
 - v. Convert the existing 7th St bikeway to a protected bikeway facility between 2nd Ave N and Plymouth Ave N.
 - vi. Provide a new pedestrian access from The Lakes Citihomes Condos to improved sidewalks along West Lake St.
- b. Lighting and security improvements throughout the corridor in the proximity of station areas.
- c. High quality aesthetic design, including community engagement, of all fence and railings throughout the corridor with agreements for long term maintenance.

ATTACHMENT B







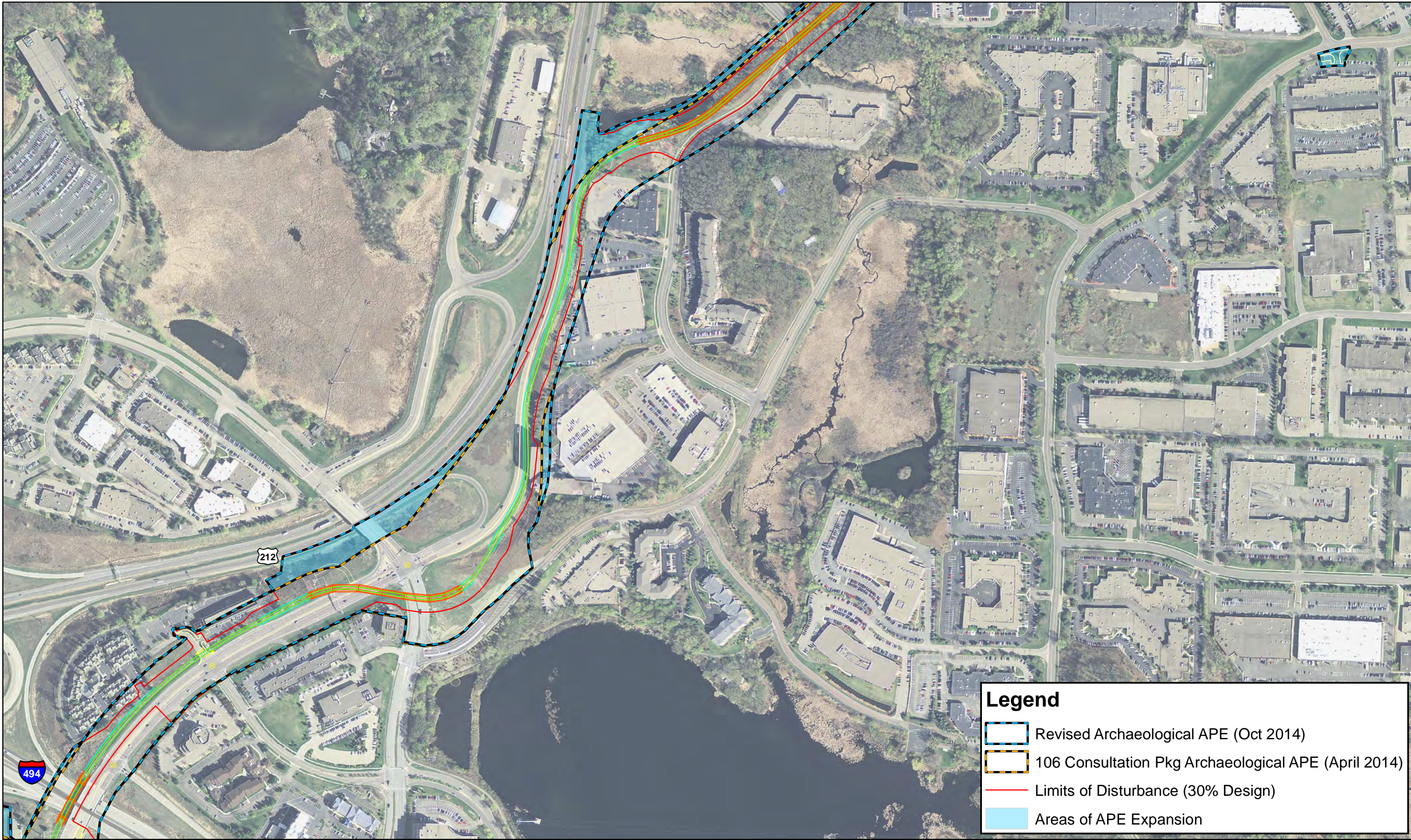
Legend

-  Revised Archaeological APE (Oct 2014)
-  106 Consultation Pkg Archaeological APE (April 2014)
-  Areas of APE Expansion
-  Limits of Disturbance (30% Design)







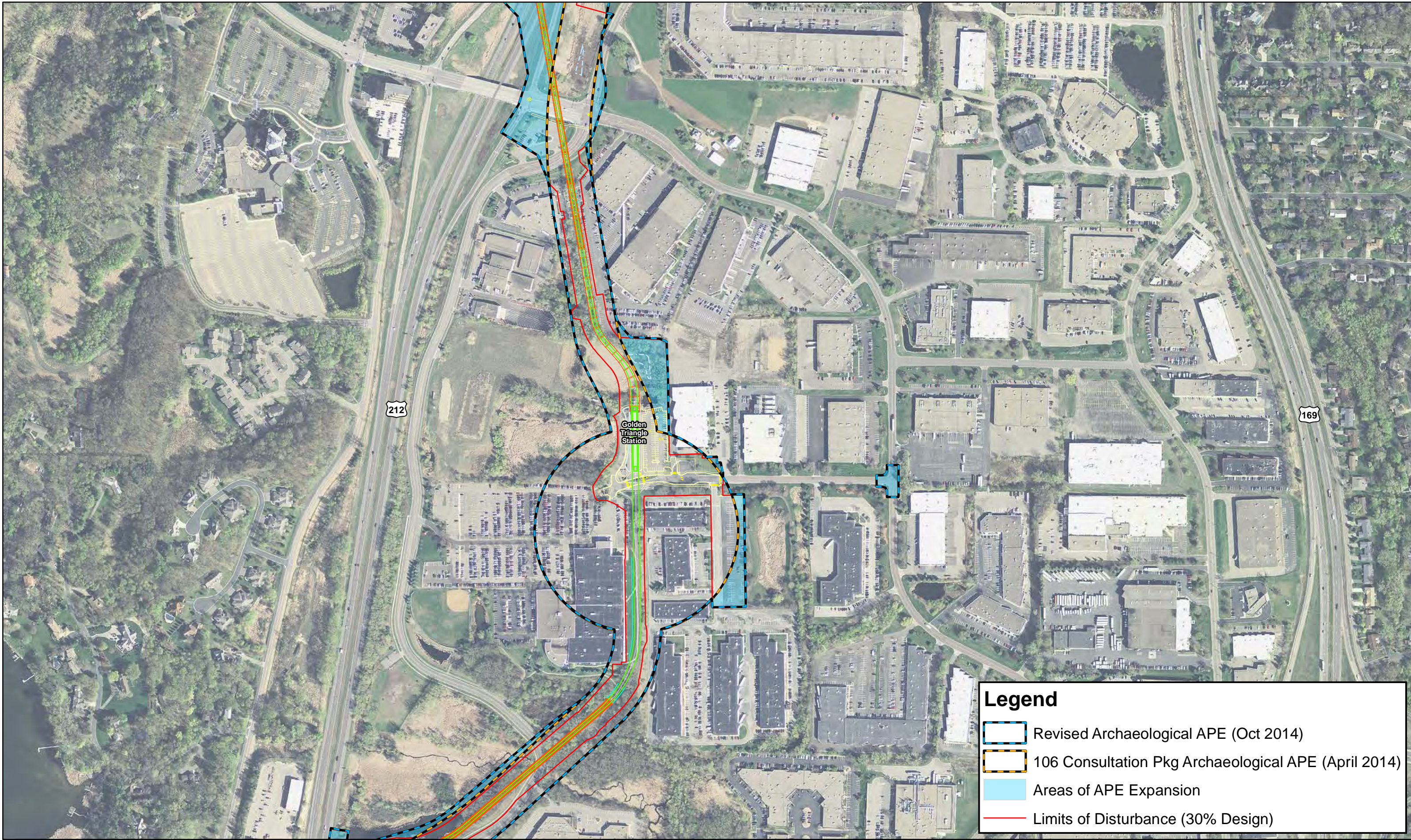
Legend

-  Revised Archaeological APE (Oct 2014)
-  106 Consultation Pkg Archaeological APE (April 2014)
-  Areas of APE Expansion
-  Limits of Disturbance (30% Design)



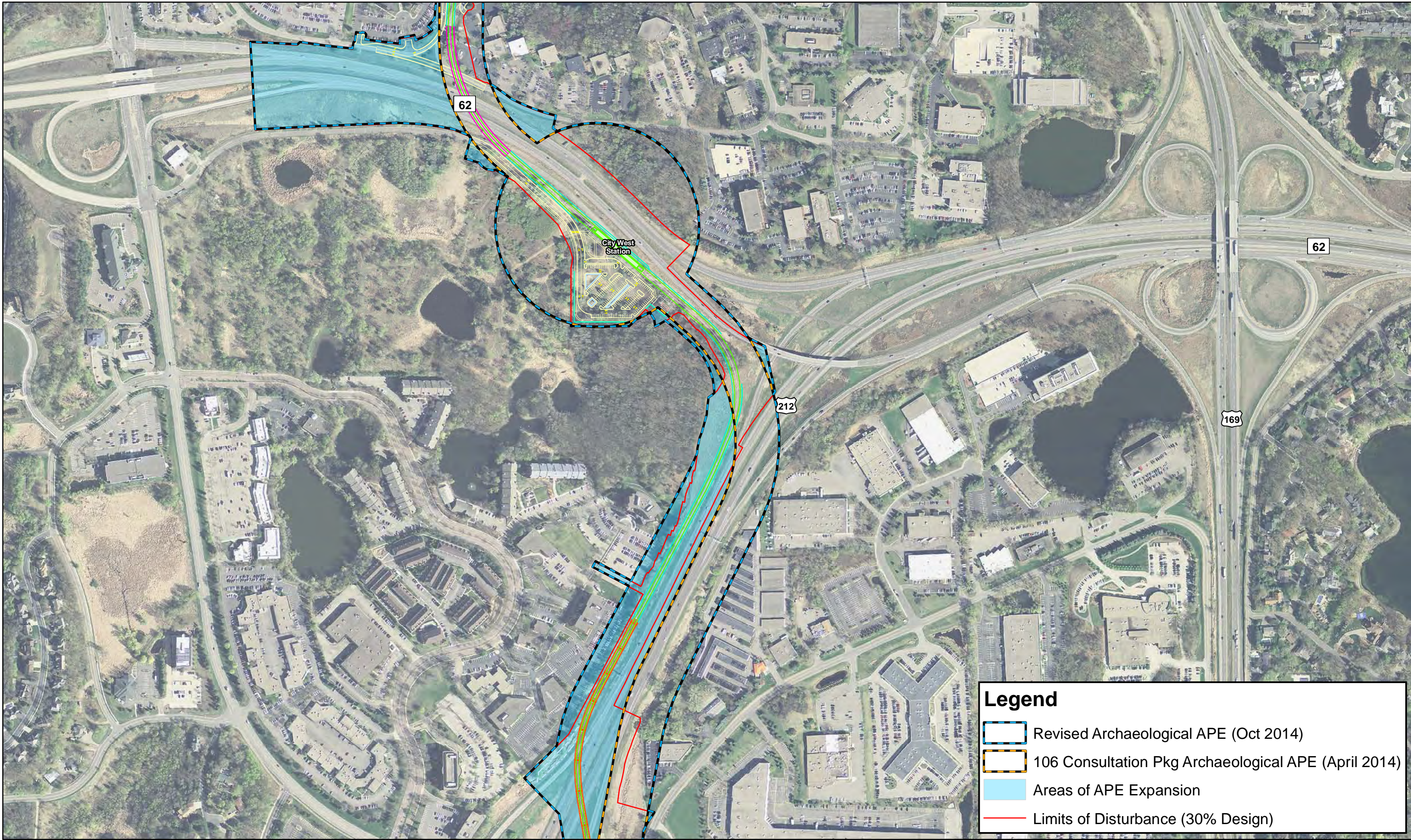
Legend

-  Revised Archaeological APE (Oct 2014)
-  106 Consultation Pkg Archaeological APE (April 2014)
-  Limits of Disturbance (30% Design)
-  Areas of APE Expansion







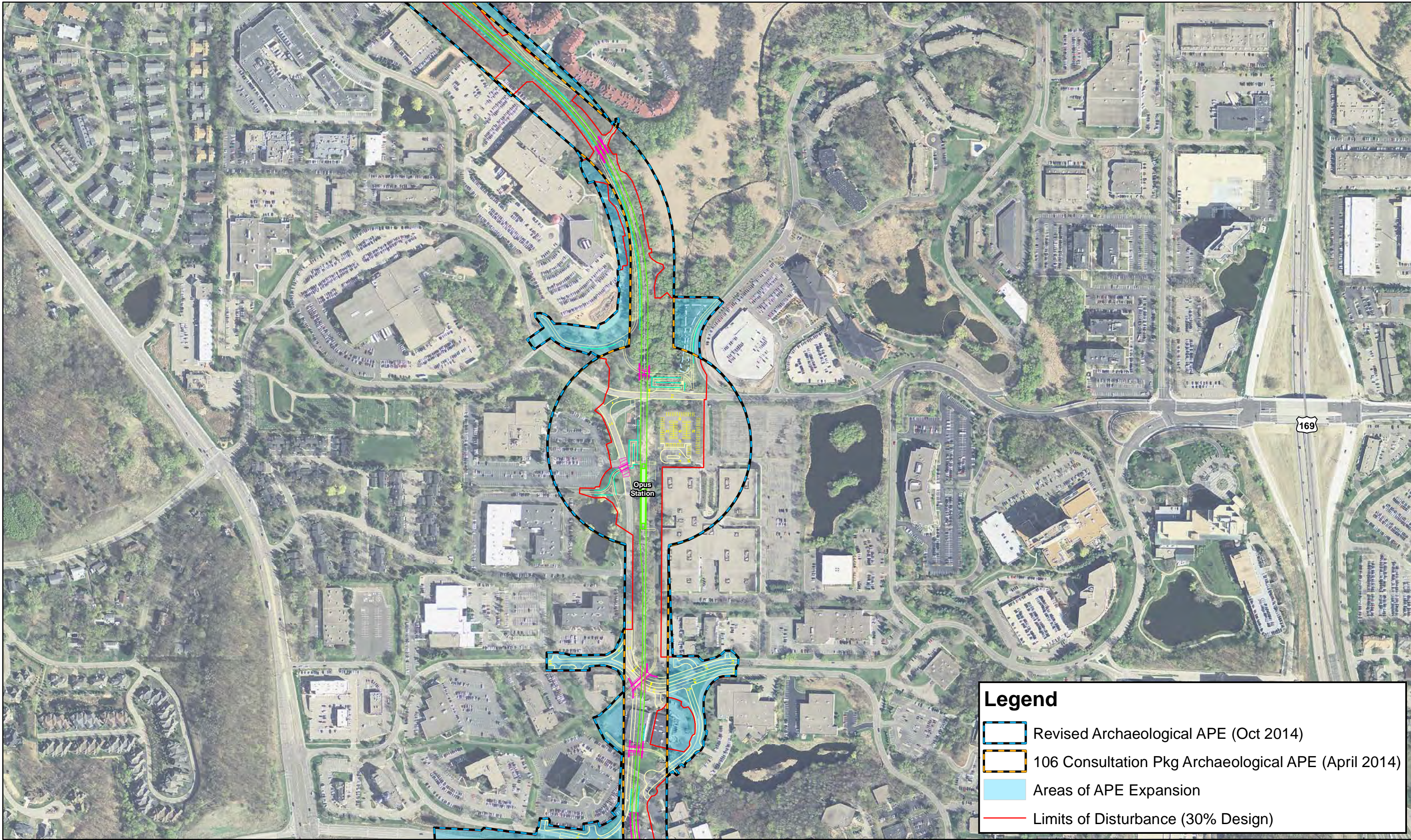
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



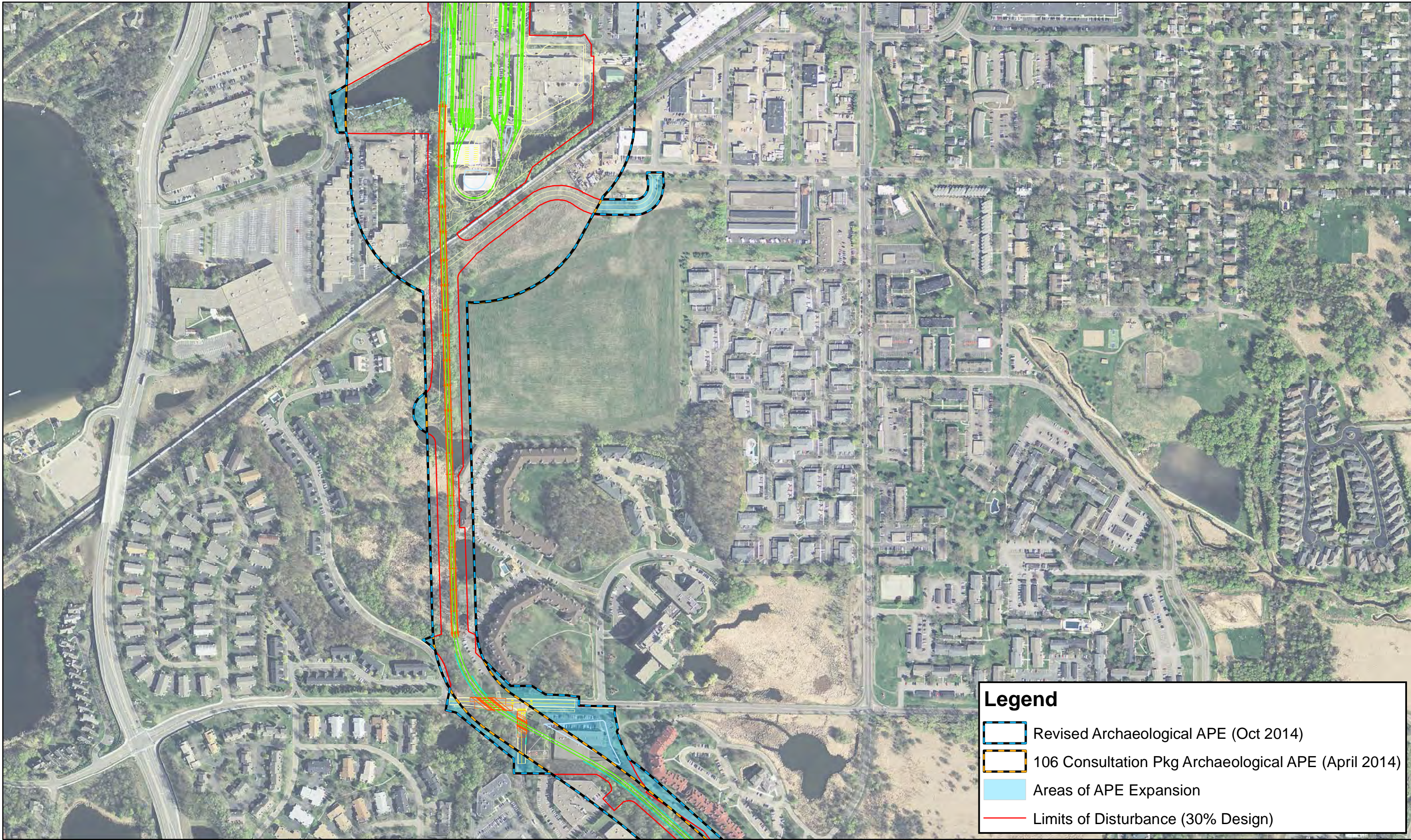
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



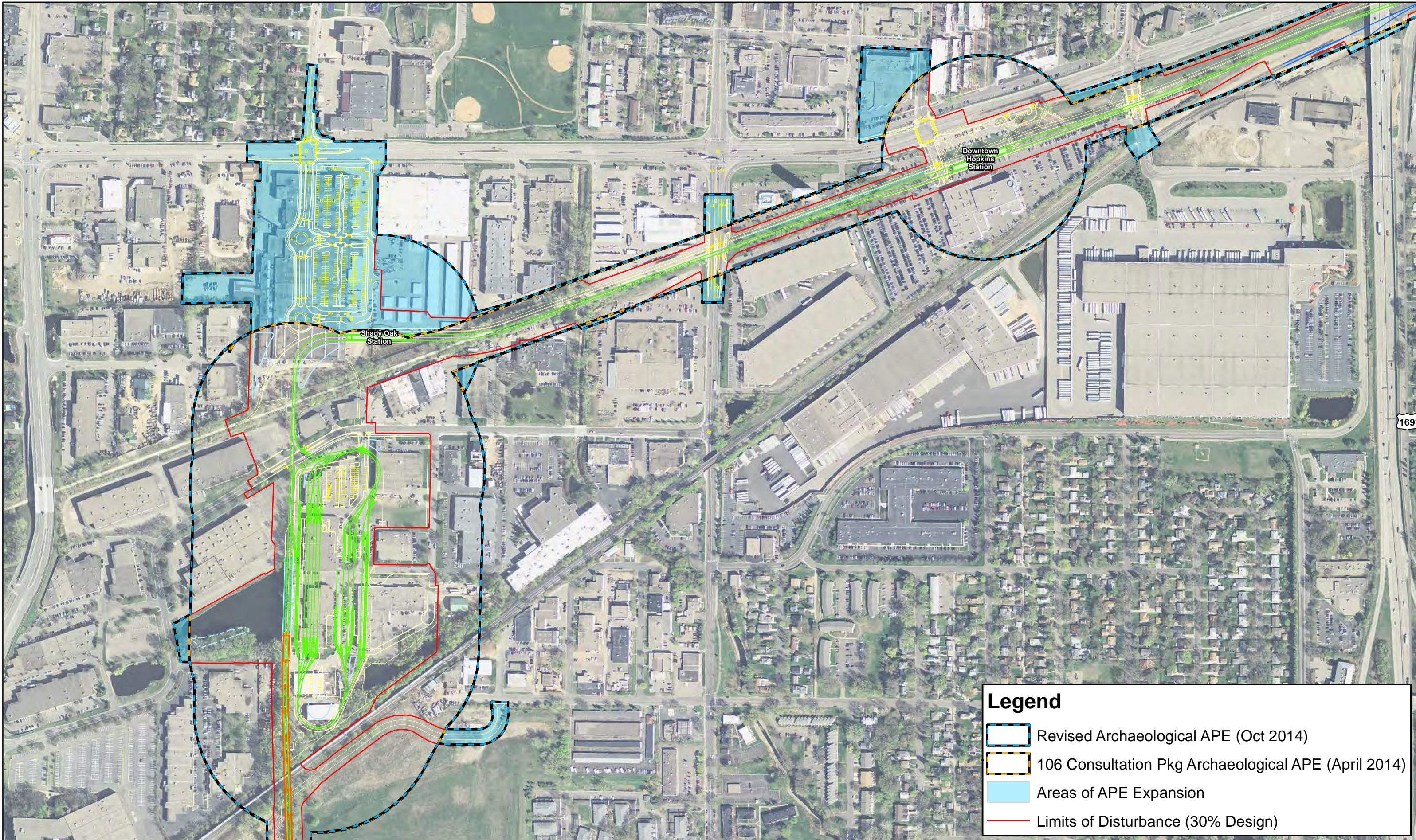
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



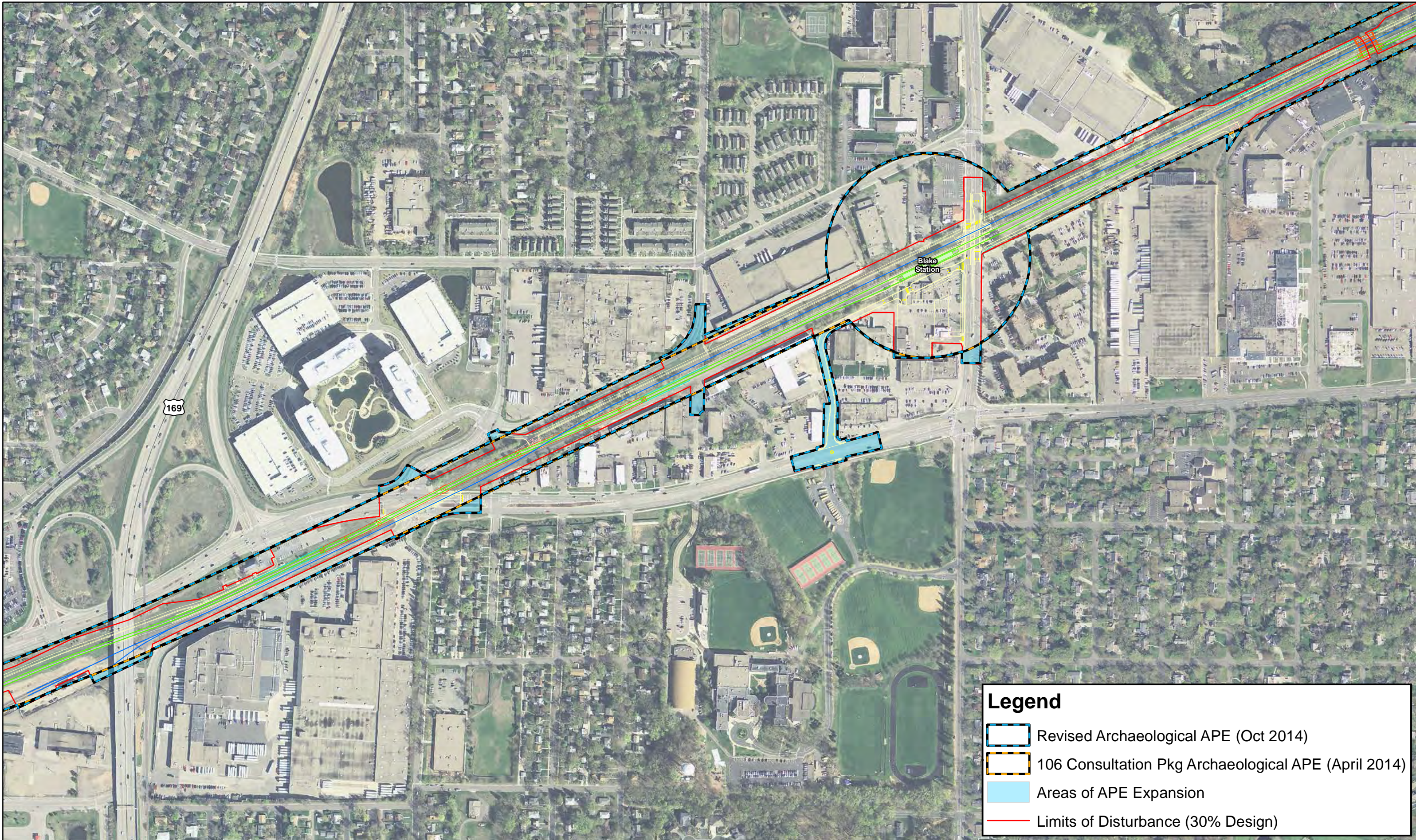
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



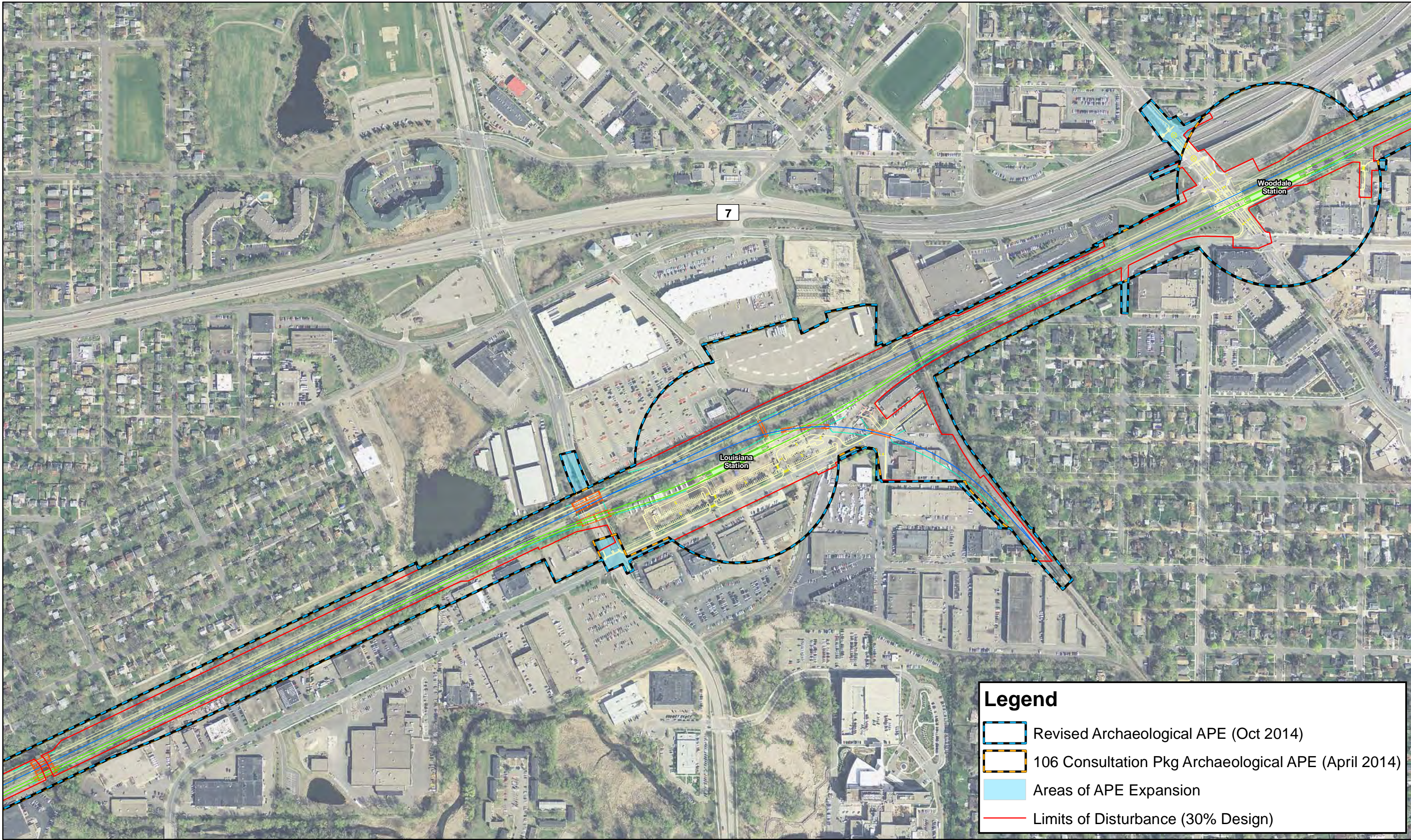
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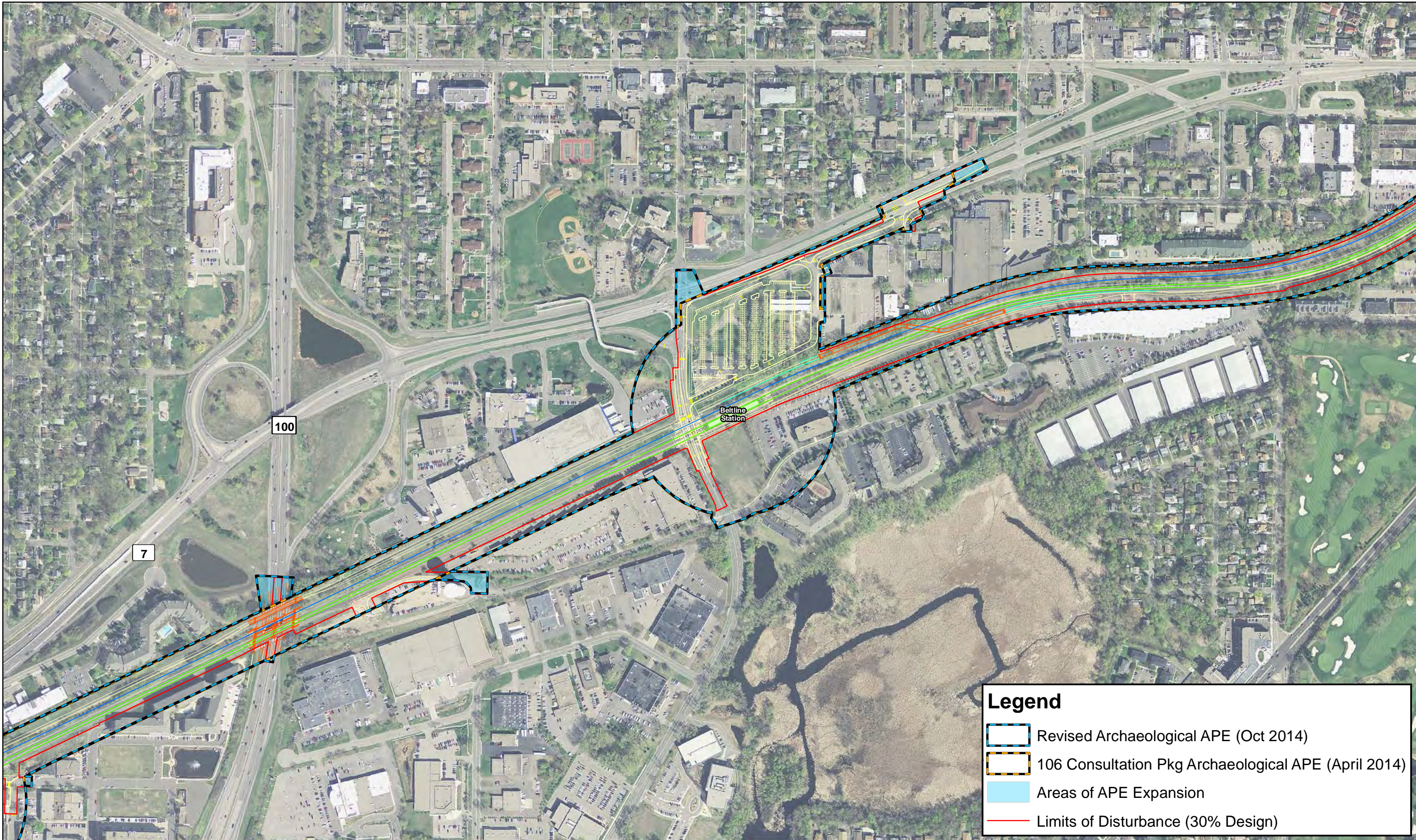
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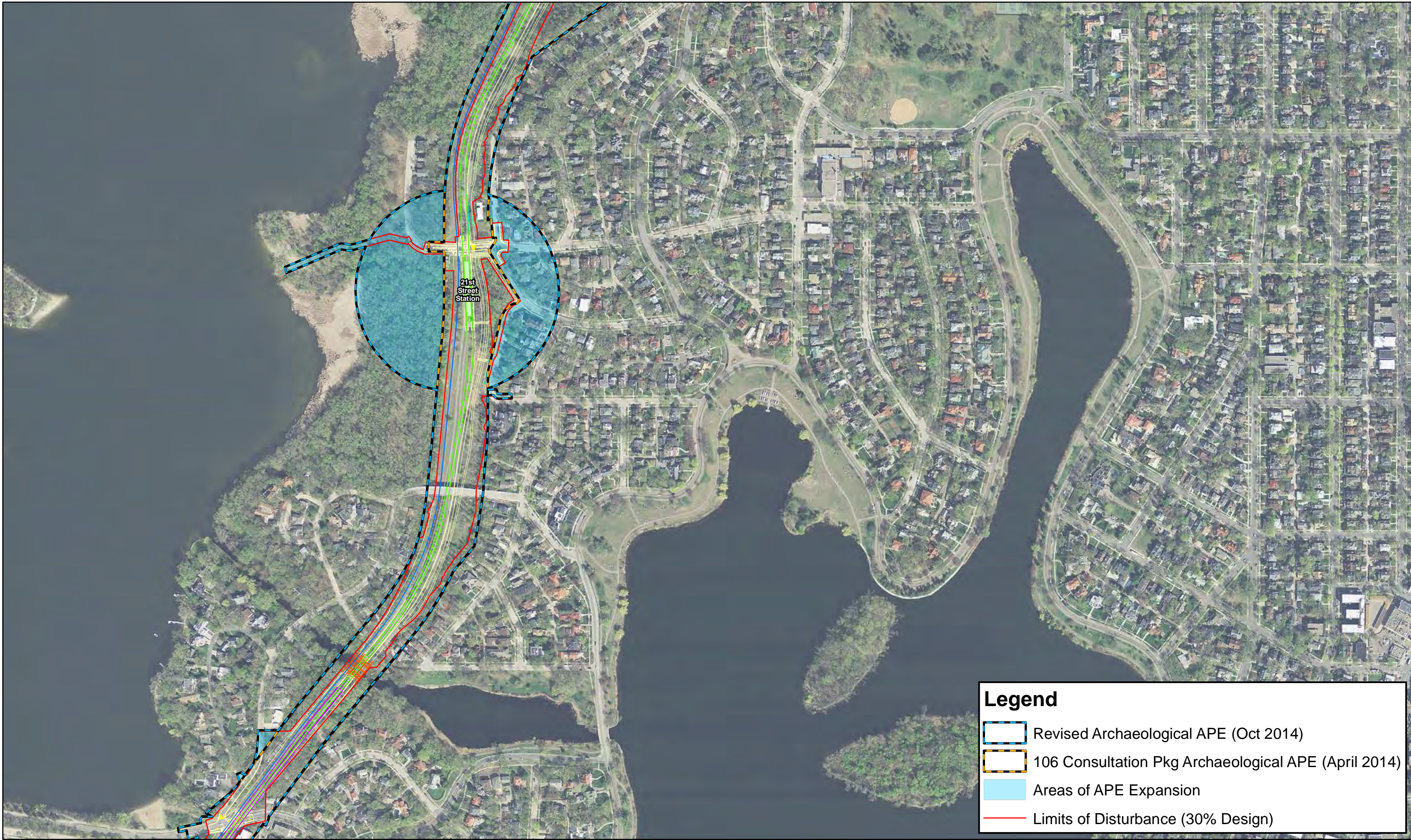
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



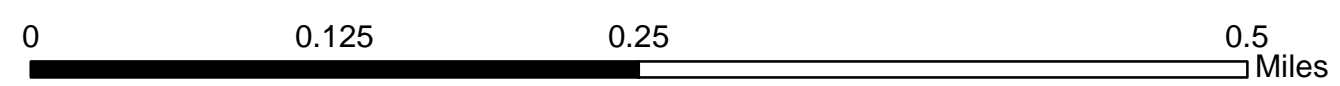
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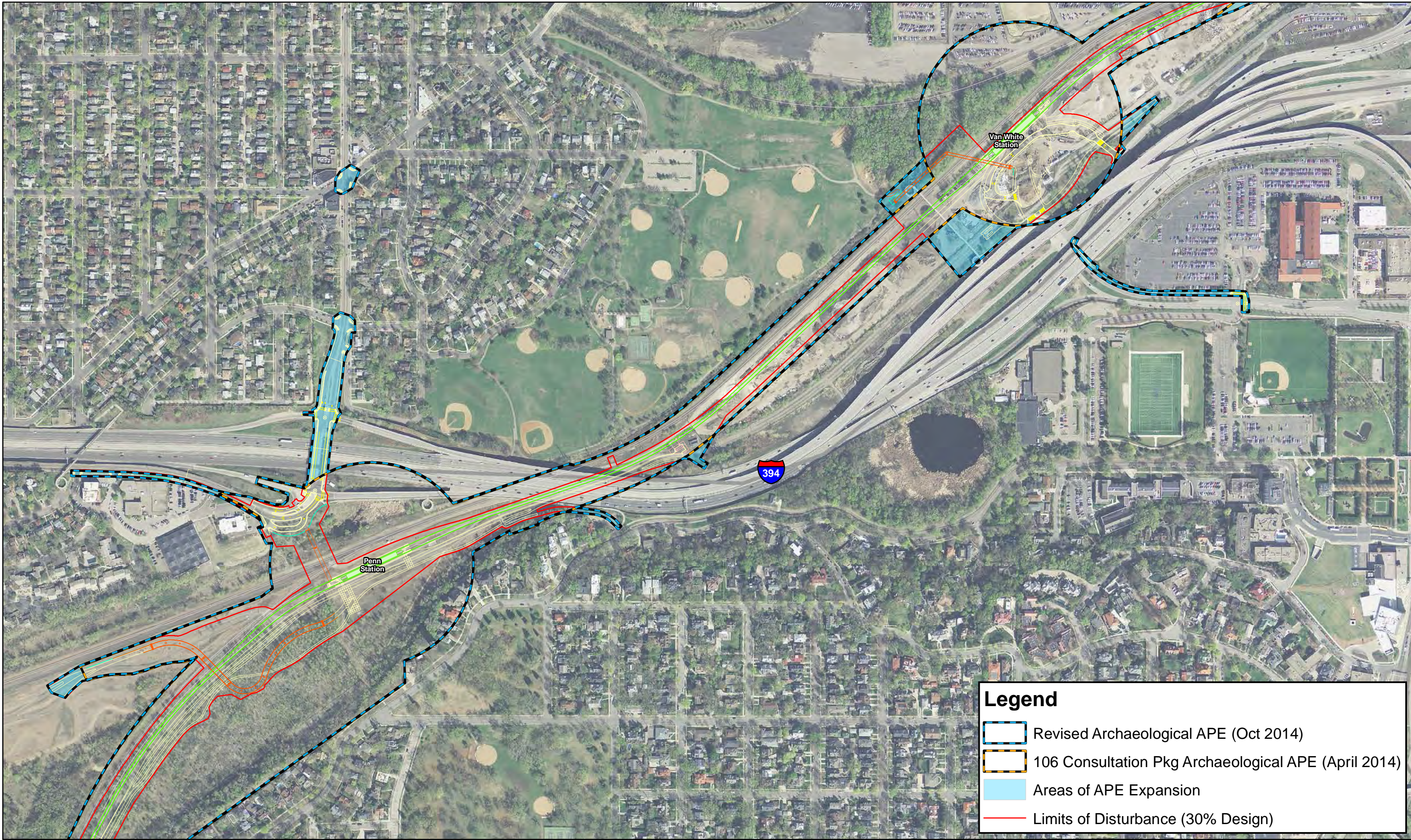
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

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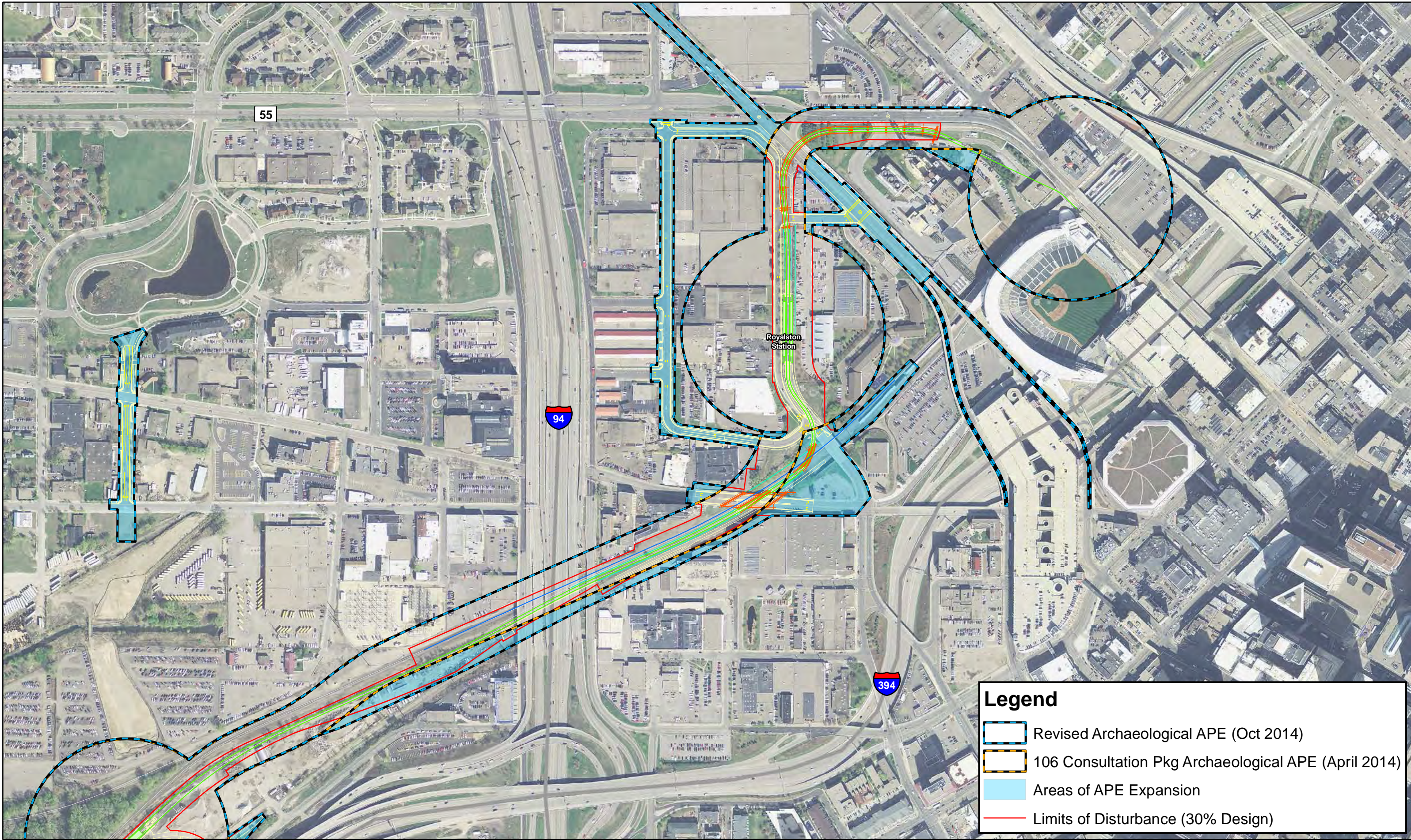
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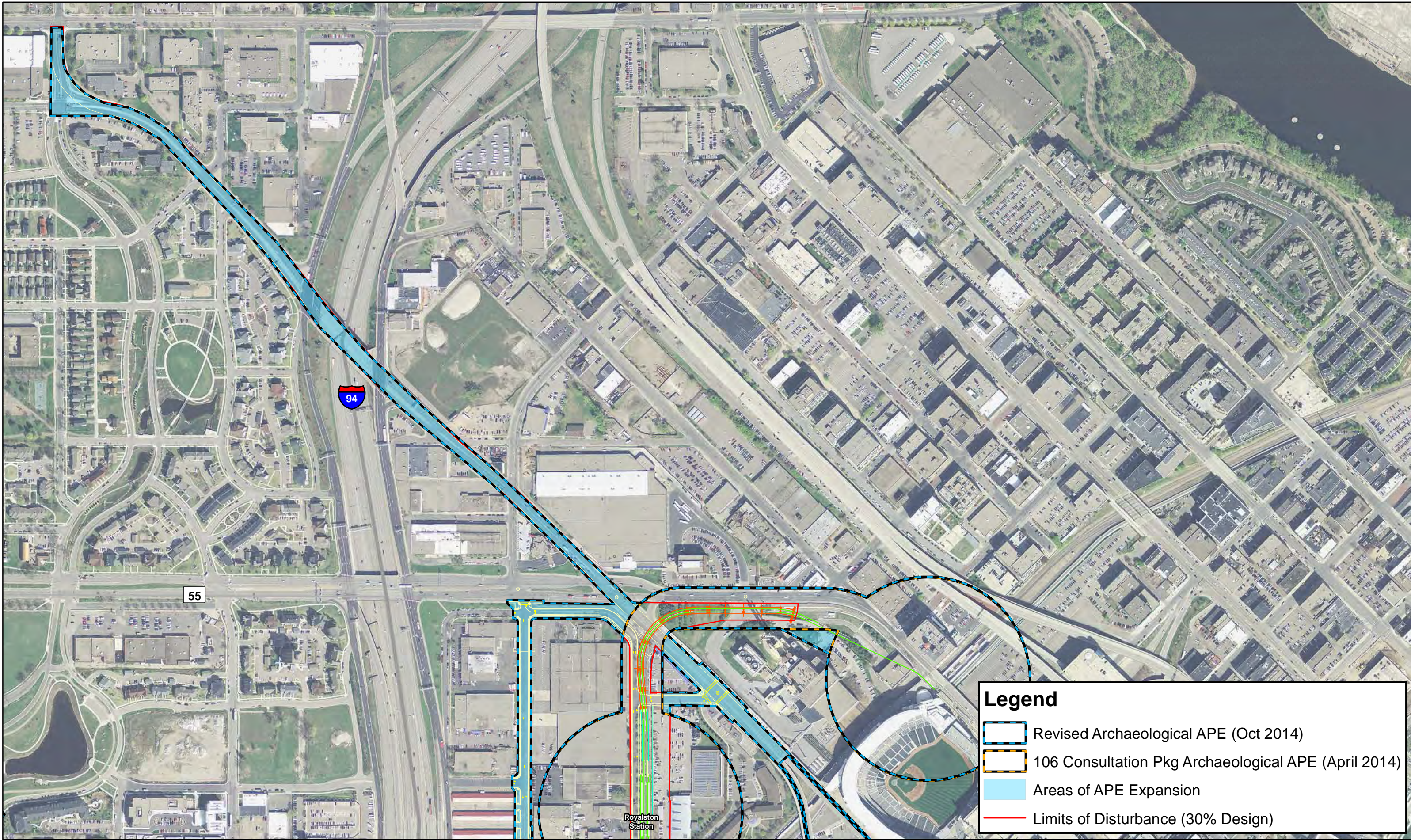
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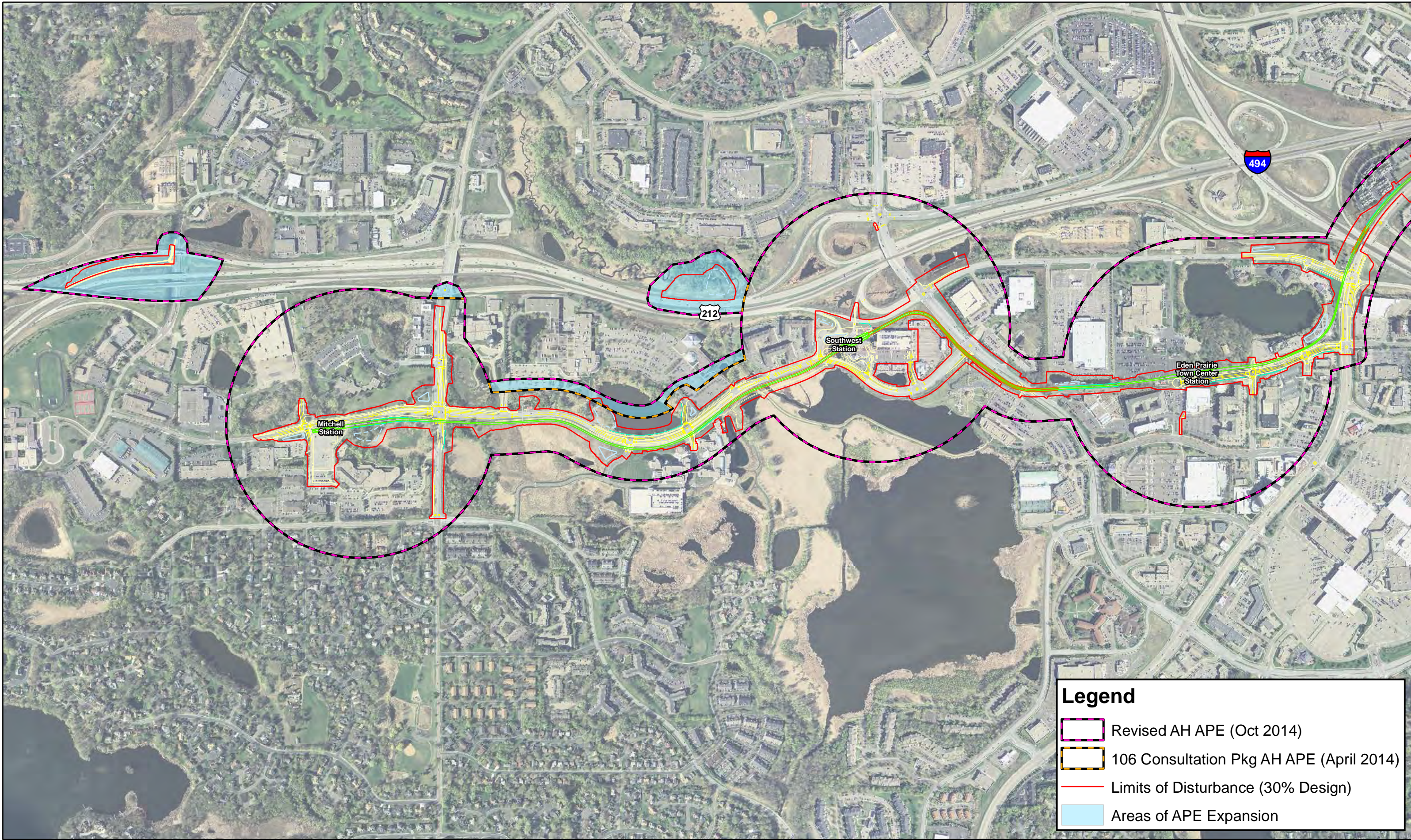
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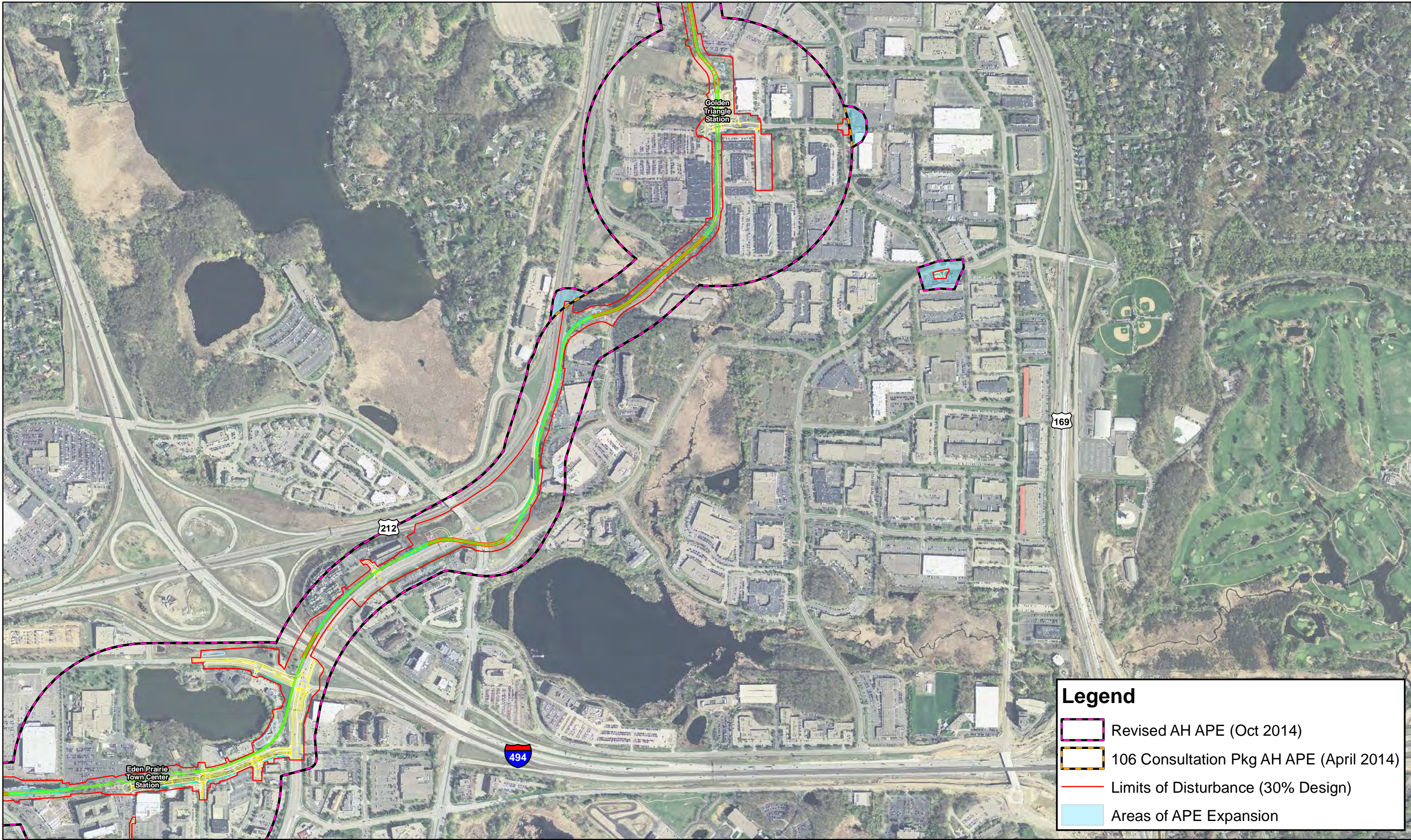
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ATTACHMENT C



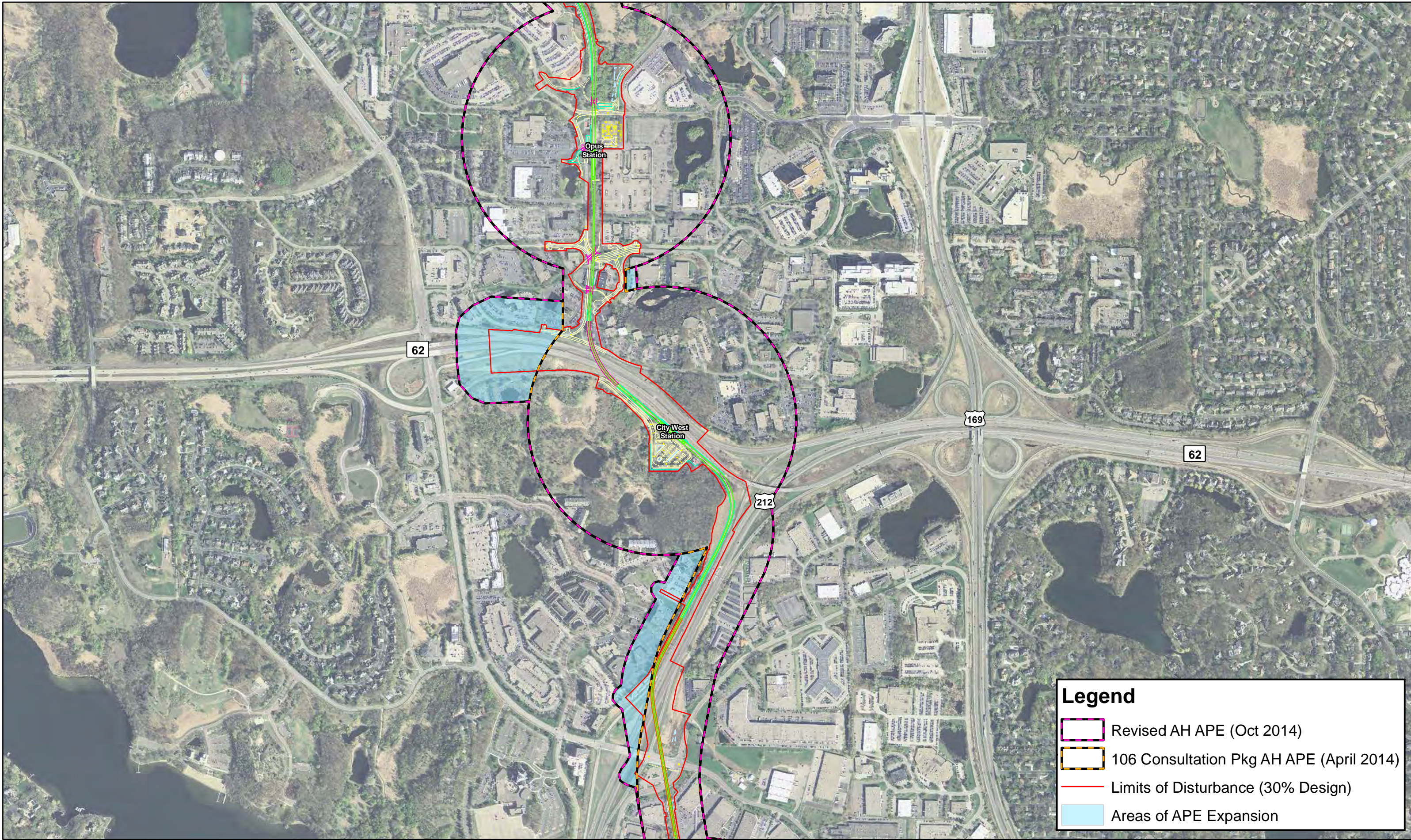
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-  Areas of APE Expansion



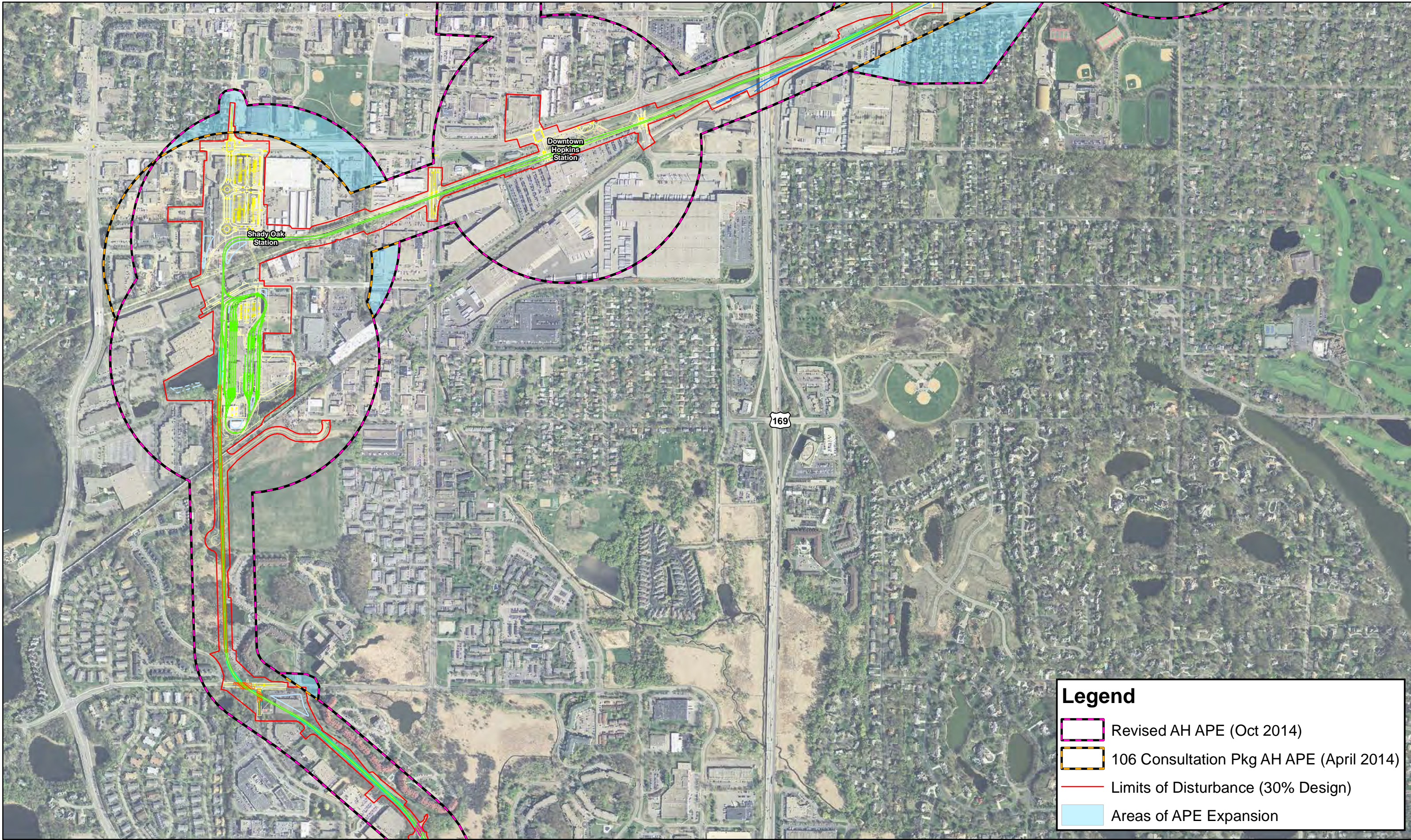
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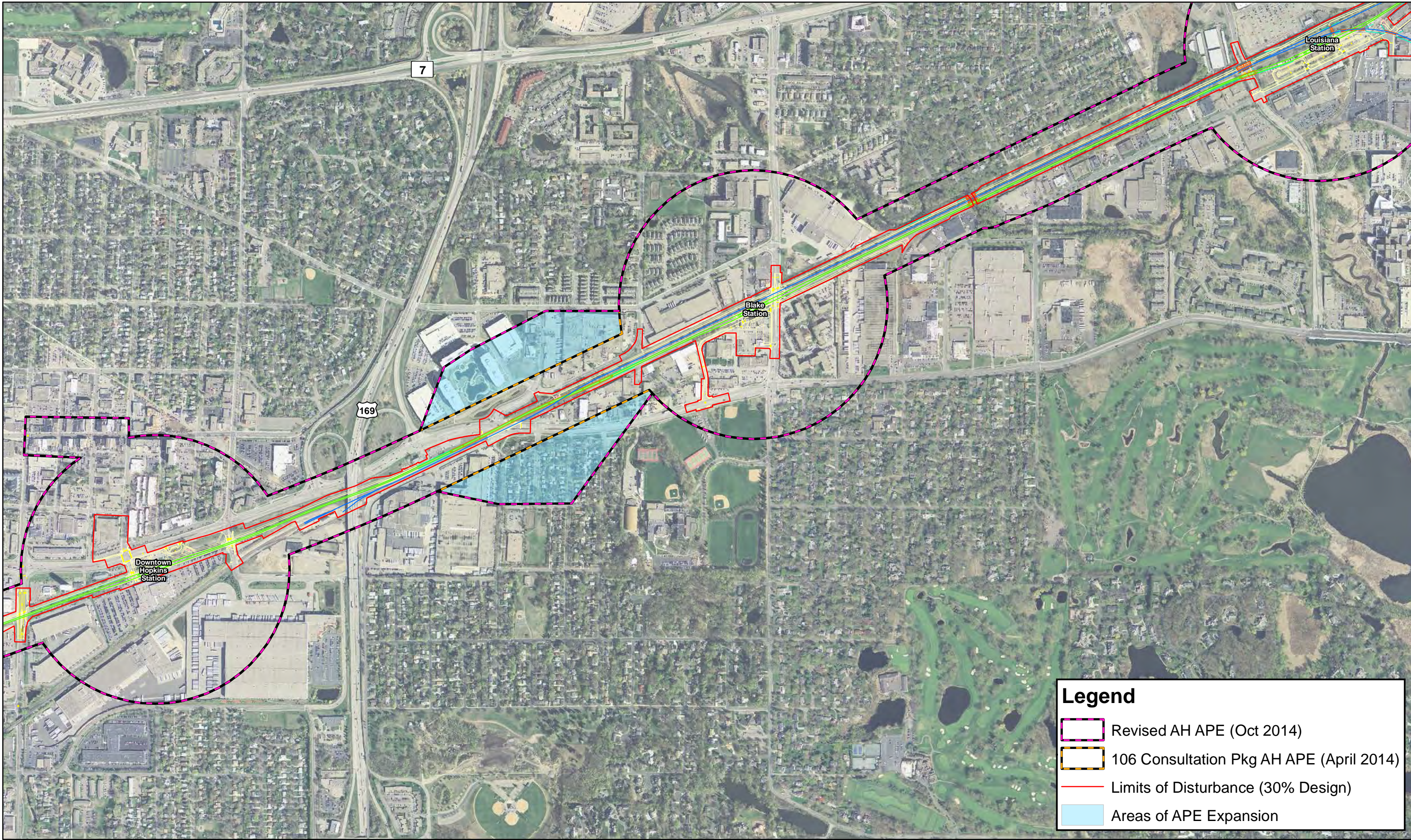
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


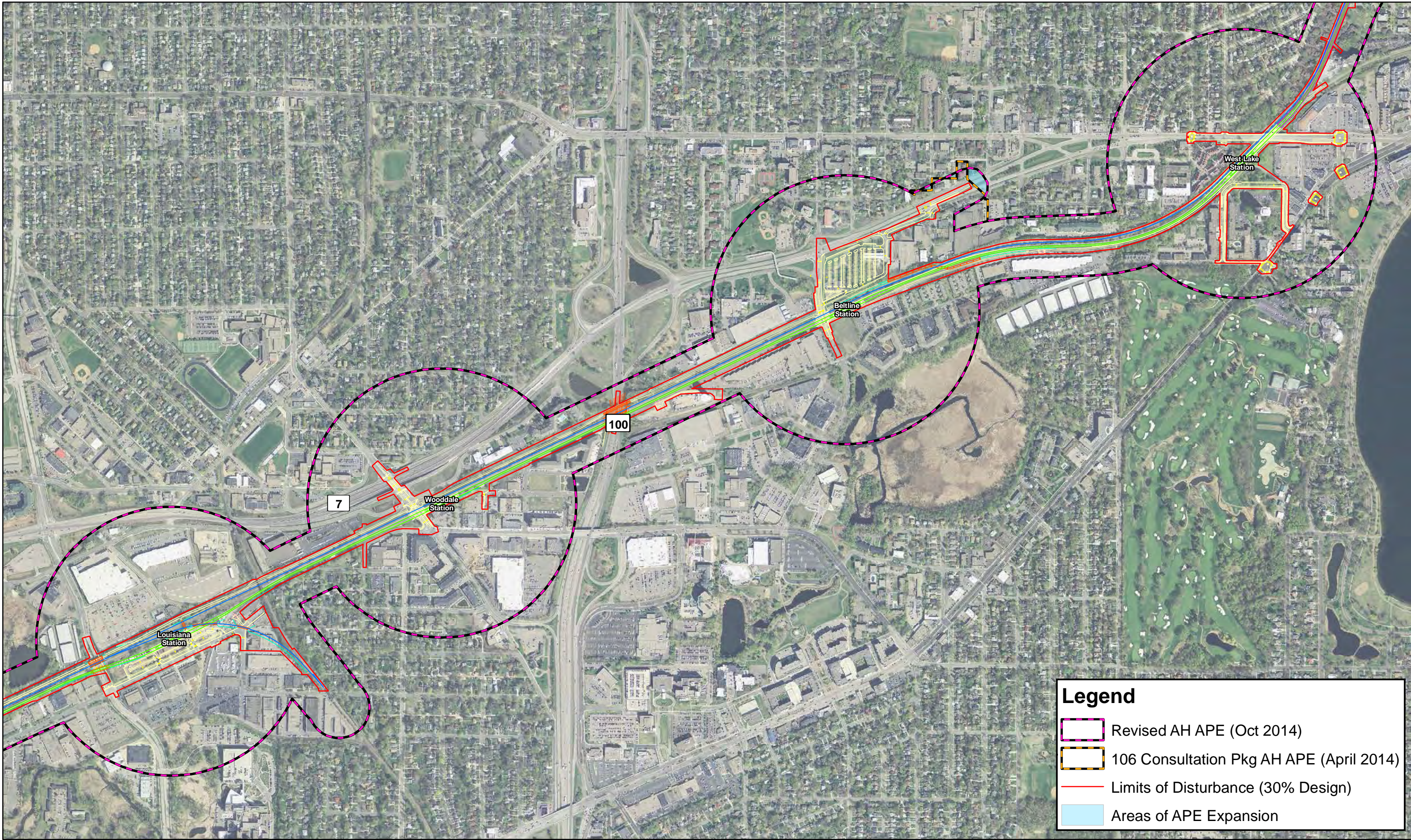
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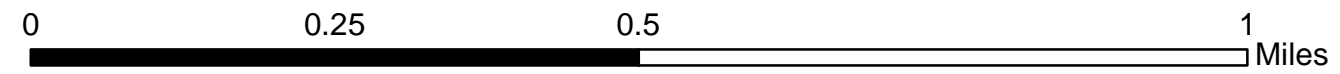
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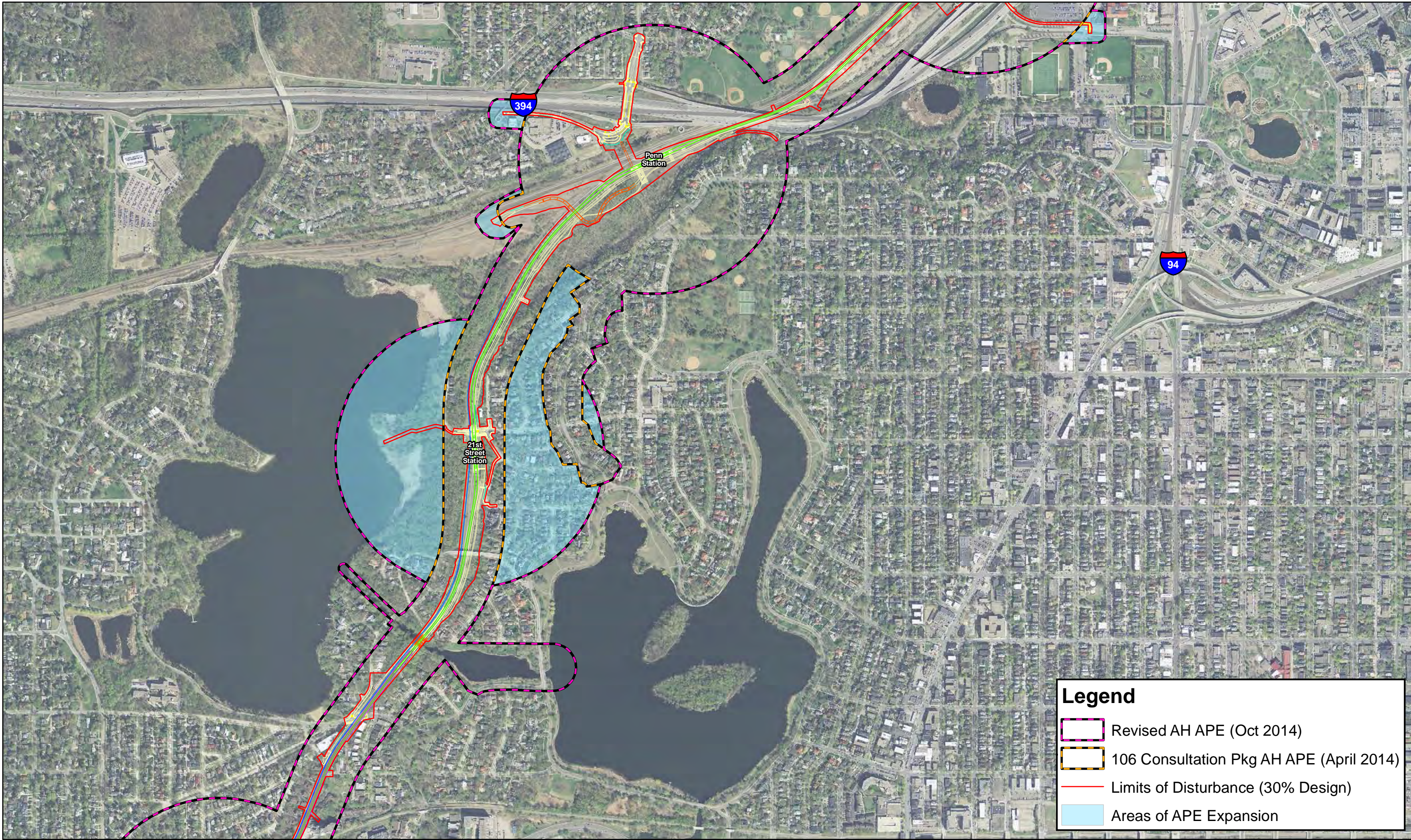
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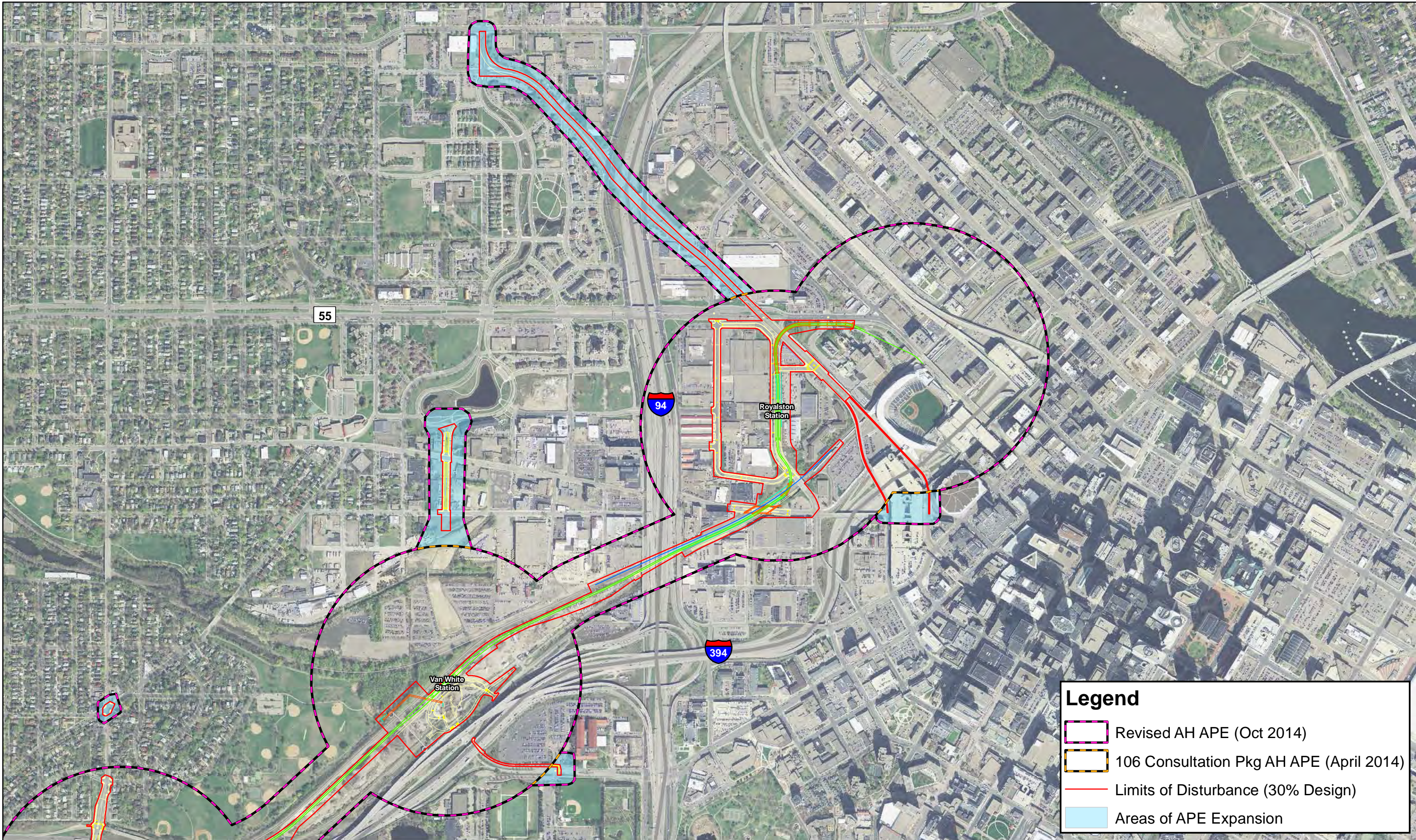
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ATTACHMENT D



Minnesota Department of Transportation

Office of Environmental Services

Cultural Resources Unit
Mail Stop 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

Office Tel: (651) 366-4292

Fax: (651) 366-3603

October 14, 2014

To: Nani Jacobson, Assistant Director, Environmental & Agreements
Metropolitan Council

From: Greg Mathis

Re: Southwest Light Rail Transit Project Research Design for Cultural Resources:
Supplement Number 1, Additional Parameters for the Area of Potential Effect for
Architecture/History Resources

Introduction

The parameters for the Area of Potential Effect (APE) for the Southwest Light Rail Transit Project (Project) are described in *Southwest Transitway: A Research Design for Cultural Resources* (Roise et al. 2010). Since the Project was still in the initial planning stage when the APE was established, the research design identified general APE limits for architecture/history resources that were used for the preparation of the Draft Environmental Impact Statement (DEIS) for the Project. These limits encompass an area 300 feet on either side of the centerline of the corridor alignment and a quarter-mile (0.25 mile) radius around each station. The research design also includes five exceptions to these parameters. Three of these exceptions were to account for unique conditions related to specific locations and/or features of alignment alternatives that were not carried forward beyond the alternatives analysis in the DEIS, thus they are no longer applicable to the current Project APE. The other two exceptions are more general in nature and still apply to the entire Project:

- Extending the APE more than 300 feet along some portions of the corridor to take into account visual effects, such as those across open areas; and
- Extending the APE outside of the 0.25 mile radius at some stations to account for project related work and/or anticipated development; and

In addition, the parameters outlined in the research design allow for extending the APE during the field survey to include property or properties not included in the established APE boundaries that a field surveyor recommended may be affected by the Project (Roise et al. 2010).

Recognizing that the full nature and scale of the Project would not become fully known until engineering and design work advanced, the APE parameters require that:

As project planning proceeds, additional factors will be assessed to determine if there are other effects (direct, visual, auditory, atmospheric,

and/or changes in use which could require an expansion of the above APE. These factors include:

- Noise analysis, including areas where the use of bells and whistles is anticipated.
- Vibration analysis, including vibration related to project construction and operations.
- The specific locations of project elements, including operations/maintenance facilities, park-and-ride facilities, traction power substations, signal bungalows, and other infrastructure (Roise et al. 2010).

Subsequent to the completion of the DEIS, Project engineering and design has advanced from a conceptual level of design (approximately 1 percent design) to approximately 30 percent plans (Preliminary Plans) for the Locally Preferred Alternative. As Project design has progressed, a number of adjustments have been made to the Project, with some adjustment being more significant than others. The more significant adjustments included a shift in the alignment for a segment in the City of Eden Prairie and the addition of a proposed operation and maintenance facility (OMF) in the City of Hopkins. The APE was subsequently revised to account for these more significant changes, using the 300 feet/0.25 mile limits established by the research design. These adjustments to the architecture/history APE were documented in Section 106 consultation materials dated April 18, 2014.

Minor changes identified in the Preliminary Plans include minor adjustments to the Project alignment and slight shifts of station locations, and the redesign of portions of the Minneapolis segment as a result of a memorandum of understanding (MOU) between the Metropolitan Council and the City of Minneapolis entered into in August 2014. In addition, the Preliminary Plans have better defined a number of Project elements such as the construction limits of vehicular, bicycle and pedestrian access route improvements for stations, and the locations of potential floodplain mitigation sites. Many of these minor changes, which are both contiguous and noncontiguous to the Project corridor and station areas, extend beyond the 300 feet/0.25 mile APE limits, thus requiring a reevaluation of the APE for architecture/history resources.

Supplemental Parameters for the APE for Architecture/History Resources

A number of minor changes and additions were identified in the Preliminary Plans that extend beyond the previously defined APE limits of 300 feet on either side of the Project corridor and/or more than 0.25 miles from the center point of a LRT station. Many of these are consistent in their nature and scale, and resultant effects. Therefore, they can be classified into one of several categories. In addition, it is anticipated that additional similar types of Project elements will continue to be identified as Project planning progresses towards construction documents (100% plans).

The original parameters for the architecture/history APE only required that analysis be done to determine if the APE needed to be expanded. They did not provide parameters for establishing limits to account for effects beyond 300 feet of the alignment or 0.25 miles of stations. Therefore, MnDOT CRU, pursuant to its FTA delegated authority, has established additional parameters for the Project's architecture/history APE. The purpose of these supplemental parameters is to provide consistency in the applicability of the APE parameters to revise the APE for common types of Project elements that extend beyond 300 feet on either side of the project corridor and/or more than 0.25 miles from the center point of a LRT station. This includes those elements identified in the Preliminary Plans and those that will continue to be identified and/or refined as engineering and design advance towards 100% plans. These supplemental parameters are identified in Table 1.

Table 1. Additional Parameters for the Architecture/History APE

Project Element	APE Limit and Rationale
<i>Modifications to Existing Roadways</i>	
Modifications to existing collector (local) streets	All property within 125' from the perimeter of the construction limits/limits of disturbance (LOD) to account for potential minor visual, noise, and vibrations effects.
Modifications to existing major arterial streets	All property within 150' from the perimeter of the construction limits/LOD to account for potential changes in traffic and noise and vibrations effects.
Modifications to existing highways (limited access)	All property within 300' from the perimeter of the construction limits/LOD to account for potential changes in traffic and noise and vibrations effects.
<i>Pedestrian and Bicycle Improvements</i>	
Pedestrian (ADA) ramps	All property within 50' from the perimeter of the construction limits/LOD to account for potential minor visual effects and noise/vibrations during construction.
Sidewalks and trail improvements (no above grade elements other than curbs and medians)	All property within 100' from the perimeter of the construction limits/LOD to account for potential minor visual effects and noise/vibrations during construction.
Pedestrian enhancements (e.g. sidewalks and trails) that include above grade elements (e.g. lighting, trees, signage, etc.)	All property within 125' from the perimeter of the construction limits/LOD to account for potential minor visual effects and noise/vibrations during construction.
<i>Borrow/Fill and Floodplain/Stormwater/Wetland Mitigation Areas</i>	
Borrow/fill, and floodplain/stormwater/wetland mitigation areas	Generally all property within 125' from the perimeter of the construction limits/LOD to account for vibrations during construction and potential permanent visual effects.

Bibliography

Roise, Charlene, Christina Harrison, Mike Justin, Mike Madson, and Joe Trnka.
 2010 *Southwest Transitway: A Research Design for Cultural Resources (Updated 16 March 2010 and 2 April 2010)*. Hess, Roise and Company, Archaeological Research Services, and HDR Engineering, Minneapolis, Minnesota.

STATE HISTORIC PRESERVATION OFFICE

November 7, 2014

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

Thank you for continuing consultation on the above project. Information received in our office on 7 October 2014 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.

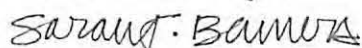
We have completed our review of additional transit project information including your correspondence dated October 3rd and the archaeological survey report entitled *Phase I Archaeological Investigation Southwest Light Rail Transit, Hennepin County, Minnesota, SDEIS Areas: Eden Prairie Segment, Archaeological Potential Area C* (CH2M Hill, September 2014).

We agree with the results of the archaeological survey which indicate that there were no archaeological resources identified and that further archaeological investigation is not warranted for Area C. We concur with your determination that there are no additional historic properties identified in this area.

It is our understanding that Phase 1 archaeological surveys will be completed for Areas A & B and the results will be submitted to our office for review and comment.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

PRESERVATION DESIGN WORKS, LLC

November 12, 2014

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services-Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

CC: Kathy Low, Kenwood Isles Area Association, KIAA, lowmn@comcast.net

RE: Southwest Light Rail Transit Project 2014
Kenwood Isles Area Association Comments on October 14, 2014 Comments Received in
Response to April Consultation on Project Effects and October 17, 2014 Adjustments to the
Area of Potential Effect

Dear Mr. Mathis,

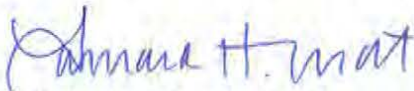
Thank you for the opportunity to review the Section 106 materials provided to Sarah Beimers of the Minnesota State Historic Preservation Office. The October 14, 2014 Comments Received in Response to April 2014 Consultation on Project Effects, SHPO #2009-0080 and the October 17, 2014 Adjustments to the Area of Potential Effect have the potential to have a significant impact on the identified historic resources located within the Kenwood neighborhood.

- KIAA agrees with the May 18, 2014 comments issued by the Minneapolis Park and Recreation Board (MPRB) regarding the size and scale of the proposed new bridge structures crossing the Kenilworth Channel and Lagoon [HE-MPC-1822] and their inconsistency with the historic cultural landscape of the channel, the noise and vibrations caused by the light rail vehicles traveling the bridge, and the fact that it may not be possible to mitigate the impacts of the new bridge. KIAA welcomes the opportunity to continue consultation on the bridge and its impact on the Kenilworth Channel and Lagoon.
- The re-introduced light rail station at 21st Street (Station) has the potential to impact the Kenwood Parkway Residential Historic District (District). The station infrastructure and related development has the potential to change traffic and parking patterns in the neighborhood, introduce long-term visual and audible intrusion, and adversely impact the District's historic setting—potential effects that extend beyond the currently proposed APE. KIAA welcomes the opportunity to continue consultation on this station.

- The re-introduced light rail station at 21st Street (Station) has the potential to adversely impact Kenwood Parkway/Grand Rounds [HE-MPC-01796]. KIAA welcomes the opportunity to continue consultation on this station.
- KIAA agrees with MNDOT's assertion that the Kenilworth Corridor is located in a park-like setting and believes that the Kenilworth Channel is a significant feature of this setting. The proposed at-grade bridge over the Kenilworth Channel [HE-MPC-1822] has significant potential to adversely impact the historic landscape of the channel. KIAA welcomes the opportunity to continue consultation on this bridge.
- KIAA agrees that lighting and security improvements throughout the corridor in the proximity of station areas will be necessary and welcomes the opportunity to continue consultation on these improvements.
- KIAA welcomes the opportunity to continue consultation on the "high quality aesthetic design, including community engagement, of all fence and railings throughout the corridor."

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,
PRESERVATION DESIGN WORKS



Tamara Halvorsen Ludt
Research Associate

PRESERVATION DESIGN WORKS, LLC

10 December 2014

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on November 12, 2014 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis,

Thank you for the opportunity to review the materials provided to Sarah Beimers of the Minnesota State Historic Preservation Office and to participate in the 24 November 2014 consultant meeting for the Southwest Light Rail Transit Project. Your warm welcome at the meeting was greatly appreciated. The Kenwood Isles Area Association (KIAA) has the following comments on the materials:

Table of Potential Effects on Historic Properties (12 November 2014):

1. KIAA contends that the language used in the Effects Analysis and Preliminary Determination of Effect is problematic. For example, it is inconsistent to write that access routes to the stations from Kenwood Parkway may "result in potential minor effects from construction of access routes... and from visual effects of access route elements" and then reach a determination of "no adverse effect." The 106 process allows for two possible determinations of effect: no adverse effect and adverse effect (36 CFR 800.5). There are not grades of adverse effects. In accordance with the regulations, KIAA asserts that "minor effects" are adverse effects and, as such, does not agree to a determination of "no adverse effect" on Kenwood's historic resources.
2. KIAA disagrees with the preliminary determination, based on preliminary plans, of no adverse effect on the Kenwood Parkway Residential Historic District (*HE-MPC-18059*), Kenwood Parkway (*HE-MPC-01796*), Kenwood Park (*HE-MPC-01797*), the Frank & Julia Shaw House (*HE-MPC-6603*), the Frieda & Henry J. Neils House (*HE-MPC-6068*), and the Mahalia & Zacharia Saveland House (*HE-MPC-6766*). KIAA agrees that changes in traffic and parking patterns created by the 21st Street Station and Penn Station need further assessment. Further, KIAA agrees that the impact of light and noise from the trains on these historic resources also requires further study. Because these potential adverse effects require further assessment, KIAA asserts that it is premature to reach a preliminary

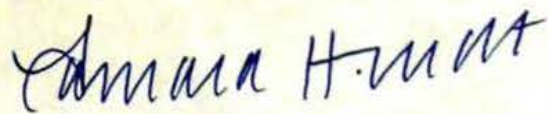
determination of "no adverse effect." If MnDOT, for the FTA, is requesting comment without a memorandum of agreement, additional documentation is required pursuant to 36 CFR 800.11. KIAA looks forward to continued consultation on all issues related to these historic resources, and requests to be a signatory to any memorandum of agreement or programmatic agreement that may be developed for this undertaking in the future.

3. KIAA believes that it is premature to reach a determination of "no adverse effect with continued consultation" because "continued consultation" is not clearly defined. At this time, plans for continued consultation have not been specified, there is not a proposed timetable, and it is not stated whether effects are going to be determined prior to, during, or after construction. While KIAA appreciates that 106 consultation is an ongoing process, it has concerns about the suggestion made during the consultant meeting that "continued consultation" could include traffic monitoring after construction as it is impossible to avoid adverse effects once stations are operational. KIAA asserts that either a memorandum of agreement pursuant to 36 CFR 800.11 or a program agreement pursuant to 36 CFR 800.14 is desirable if effects cannot be determined prior to approval of the undertaking.
4. KIAA is concerned about the impact of construction on Kenwood Parkway, the Kenwood Parkway Residential Historic District, Kenwood Park, the Frank and Julia Shaw House, the Frieda & Henry J. Neils House, and the Mahalia & Zacharia Saveland House. Do the vibration studies account for increased truck and construction equipment traffic and the resulting vibrations and potential impacts on historic resources? If not, KIAA requests preparation of a construction protection plan that incorporates guidance offered by the National Park Service in Preservation Tech Note #3: Protecting a Historic Structure during Adjacent Construction.
5. Assuming that the vibration studies account for the impact of construction and construction-related traffic, KIAA agrees with the finding of "no adverse effect" on the Kenwood Water Tower (*HE-MPC-06475*). If the vibration studies do not account for construction and related equipment, KIAA does not agree with a finding of "no adverse effect" on the Kenwood Water Tower until development of a construction protection plan that incorporates guidance offered by the National Park Service in Preservation Tech Note #3: Protecting a Historic Structure during Adjacent Construction, as well as a memorandum of agreement or a programmatic agreement that specifies how these potential impacts will be monitored following approval of the undertaking.
6. KIAA agrees with the determination of "adverse effect" on the Kenilworth Lagoon. KIAA would like to reiterate the Minneapolis Park and Recreation Board and SHPO concerns, expressed during the November 24, 2014 consultants meeting, regarding the setting and visitor experience of the lagoon. "Setting" and "feeling" are criteria of integrity that are used to determine National Register of Historic Places eligibility and KIAA is concerned that an increase in sound will adversely alter the setting and feeling of the Kenilworth Lagoon and will adversely impact how people use this historic resource. KIAA looks forward to continuing consultation on all issues related to the Kenilworth Lagoon.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

PRESERVATION DESIGN WORKS



Tamara Halvorsen Ludt
Architectural Historian
& Research Associate

cc: Kenwood Isles Area Association
Cedar Isles Dean Neighborhood Association
Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400
Fax:
612-230-6500

www.minneapolisparke.org

December 12, 2014

Greg Mathis
MnDOT Cultural Resources Unit
Office of Environmental Stewardship
Mail Stop 620
395 John Ireland Boulevard
Saint Paul, MN 55155

**Re: Minneapolis Park and Recreation Board Comments on the
Southwest LRT Section 106 Review**

Dear Greg:

The Minneapolis Park and Recreation Board (MPRB) welcomes this opportunity to comment further on the Section 106 Review for the Southwest Transitway (SWLRT) project. We remain concerned about the archaeological and architecture/historic resources on MPRB land that will be adversely affected by the SWLRT project route and construction plans.

With respect to the adverse effects to the Kenilworth channel of all bridge changes, MPRB staff have the following comments:

- Burnham Road Bridge (HE-MPC-1832) - Although the bridge is a non-contributing feature of the Grand Rounds Historic District, we feel the views from and to it of the SWLRT Project are an important component of the historic nature of the channel, and need to be considered an adverse effect overall.
- Lake Calhoun (HE-MPC-01811) – We continue to be concerned about the traffic and safety impacts of the West Lake Station on this important element of the Grand Rounds, as discussed in our May 16, 2014 comment letter.
- Cedar Lake Parkway (HE-MPC-01833) – We reiterate our comments in our May 16, 2014, comment letter of concern about the ‘quiet zone’ nature of this area and the need to be sure the construction design and documents reflect this unique designation and need.

President
Liz Wielinski

Vice President
Scott Vreeland

Commissioners
Brad Bourm
John Erwin
Meg Forney

Stefanie Mursich
Jon C. Olson
Anita Tabb
M. Annie Young

Superintendent
Jayne Miller

Secretary to the Board
Pamela French



- Kenilworth Lagoon (HE-MPC-1822) – The MPRB agrees with the determination of adverse effect of the SWLRT project on the Kenilworth Channel and Lagoon. Noise, dust and views throughout the area will be significantly impacted. We are concerned that no amount of mitigation will offset these adverse effects on the quiet, naturalistic and picturesque nature of the park experience and use.
- Cedar Lake (HE-1820) – We disagree with the preliminary determination of no adverse effect to Cedar Lake at this time. There has not been sufficient study of the sound and visual effects of the proposed project at the Kenilworth Channel nor at the westerly end of the Channel at Cedar Lake to make this conclusion at this time.
- Park Board Bridge #4 (HE-MPC-6901), Lake of the Isles Parkway (HE-MPC-1825), and Lake of the Isles (HE-MPC-1824) – For all three Grand Rounds elements, the preliminary determination remains ‘to be determined.’ All three seem to anticipate the design of the new bridges may avoid, minimize or mitigate any adverse effects. So far, we have seen no evidence that significant mitigation can be achieved.

We recognize that the project office provided potential bridge designs at the consultation meeting on November 24, 2014. Overall, it seems premature for the MPRB to provide comment on designs for the Kenilworth Channel bridges. We would appreciate knowing when the official comment period for these designs is going to begin and end. In the interim, as described above, it appears impossible to mitigate adverse effects based on the features of these designs.

Thank you for this opportunity to comment on the Section 106 review for the LRT. If you have any questions, please do not hesitate to contact Jennifer Ringold, Director of Strategic Planning, at 612-230-6464 or jringold@minneapolisparcs.org.

Sincerely,



Jennifer Ringold
Director of Strategic Planning

STATE HISTORIC PRESERVATION OFFICE

December 12, 2014

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis,

Thank you for continuing consultation on the above project which is being 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 two (2) project consultation packages which were submitted to our office on 17 October 2014 and 12 November 2014. Our comments are provided below.

In addition to reviewing these materials, we participated in the Section 106 Consulting Parties meeting held at the Southwest Project Office on November 24, 2014. Thank you for convening all of the consulting parties and agency representatives for this meeting.

Area of Potential Effects Revisions

As indicated and agreed to in the project's 2010 research design for cultural resources, you have recently completed a reevaluation of the area of potential effect (APE) determinations for this project. The APE reassessment at this time is a result of completion of the 30% Preliminary Plans and several adjustments to the project scope as outlined in the memorandum of understanding (MOU) between the Metropolitan Council and the City of Minneapolis. Although there are previously identified historic properties within the revised APEs, it is our understanding that your agency will continue with identification and evaluation efforts within previously un-surveyed areas and submit these for our review upon completion. At this time, we concur with your determinations for and documentation of the revised APEs as submitted.

You have also provided documentation regarding the establishment of additional parameters for continued analysis of potential adverse effects and adjustments to the APE as project design development continues. We agree with your determination that these additional parameters will provide consistency in the applicability of APE determinations for common project elements.

Preliminary Project Effects Assessments

It is our understanding that the assessments of adverse effect and preliminary determinations of effect provided in your November 12th correspondence have been determined based upon project engineering at the 30% design stage and that adverse effect determinations will be made by the Federal Transit Administration.

We acknowledge that we have previously provided concurrence with what your agency defined, and therefore we perceived, as "assessments of potential effect" which included commonly used Section 106 terminology of "no adverse effect" and "adverse effect". These are now presented in Section 1 of the table entitled *Southwest Light Rail Transit Project: Section 106 Review – Preliminary Determination of Effects on Historic Properties 11/12/2011* (Table) as effect determinations and defined as such in your correspondence. To date, the FTA has not provided final effect determinations for our review and concurrence, therefore these determinations should not be presented as final.

For the historic properties listed under Section 2 and Section 3 of the Table, we agree that the assessment of potential effects and proposed action steps are appropriate at this time. To reiterate, it is our opinion that the preliminary effect determinations provided in this Table serve only to provide a basis for continuing project design development in an effort to avoid or minimize potential adverse effects. We will defer concurrence with any "no adverse effect" or "adverse effect" determinations, preliminary or otherwise, until such time as the FTA provides these determinations to our office for review.

We took the time to review the original correspondence dated May 4, 2010 which, pursuant to 36 CFR 800.2(c)(4), designated your agency to act on behalf of the FTA to complete the following, in consultation with our office, identified consulting parties, and the public:

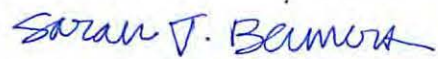
- Initiate the Section 106 process;
- Identify the area potential effect (APE);
- Conduct appropriate inventories to identify historic properties within the APE;
- Make determinations of eligibility to the National Register of Historic Places;
- Make assessments of potential effect.

The FTA indicated in this letter that they would retain authority to "make determinations of adverse effect" and negotiate the terms and conditions of a Section 106 agreement, if necessary. We respectfully request clarification from the FTA and your agency addressing our concerns and expectations for consultation regarding the results of assessment of adverse effect pursuant to 36 CFR 800.5(d).

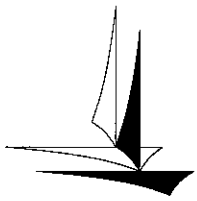
Regarding our review of the *Kenilworth Lagoon/Channel Context, History, and Physical Description* report, we agree that this report provides critical information regarding the historic context, physical description, and identification of character-defining features of the Kenilworth Lagoon/Channel property which is a sub-segment of the Chain of Lakes Segment of the National Register-eligible Grand Rounds Historic District. While this report provides identification of the cultural landscape's character-defining features, we recommend that the final version of this report include information regarding identification and evaluation, following National Register criteria, for features in terms of those which may be considered "contributing" or "non-contributing" elements to the eligible historic district. This information will be essential as we continue to consult regarding the assessment of adverse effects and resolution of potential adverse effects.

We look forward to continuing consultation on this project. 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.

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers". The signature is written in a cursive style with a small dot above the letter 'i' in "Beimers".

Sarah Beimers, Manager
Government Programs & Compliance



Minneapolis
City of Lakes

**Community Planning &
Economic Development**

105 5th Avenue S, Suite 200
Minneapolis MN 55401

Office 612-673-2597
Fax 612-673-2728
TTY 612-673-5154

December 15, 2014

Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

**RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota;
consultation on potential effects (SHPO#2009-0080)**

Dear Mr. Mathis,

Thank you for providing the materials included in your November 12, 2014 submittal and facilitating the consultation meeting on November 24, 2014 where additional materials about the potential Kenilworth Corridor channel bridge concepts were shared. 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 preliminary determinations of effect are organized in a manner consistent with the organization presented in your November 12, 2014 correspondence and in the table of Preliminary Determination of Effects on Historic Properties.

Section 1 Properties

CPED-Long Range Planning agrees with the analysis of effects, preliminary determinations and associated actions for the Minneapolis properties:

- M&STL RR Bridges over Kenilworth Lagoon
- Burnham Road Bridge
- St. Paul, Minneapolis & Manitoba RR/Great Northern Rwy. Historic District
- Osseo Branch of the St. Paul, Minneapolis & Manitoba RR Historic District
- The Parade
- Site 21HE0436
- Minneapolis Warehouse Historic District

Section 2 Properties

Minikahda Country Club: CPED-Long Range Planning agrees with the effects and the preliminary determination of an adverse effect and action to develop and implement agreement measures. CPED-Long Range Planning agrees with intent to avoid adverse effects through pursuing design alternatives. However, if avoidance of the adverse effects impact results in minimal or no improvements for pedestrian connectivity, CPED-Long Range Planning believes that improving the pedestrian connectivity at this intersection

should be given priority while minimizing and mitigating physical impacts to the Minikahda Club property.

Frieda & Henry J. Neils House: The materials provided as part of the consultation to date do not address any potential effects of vibrations. CPED-Long Range Planning agrees with the other analysis of effects listed in the table, the effects from vibrations should be considered as part of future consultation.

CPED-Long Range Planning agrees with the analysis of effects, preliminary determinations and actions for the following properties identified in Section 2 of the table:

- Lake Calhoun (Grand Rounds)
- Cedar Lake Parkway (Grand Rounds)
- Mahalia & Zacharia Saveland House
- Site 21HE0409
- Kenwood Parkway Residential Historic District
- Kenwood Parkway (Grand Rounds)
- Frank & Julia Shaw House
- Kenwood Park (Grand Rounds)
- Kenwood Water Tower
- Mac Martin House
- Dunwoody Institute

For these properties CPED-Long Range Planning looks forward to future consultation where it is listed as part of the identified actions.

Section 3 Properties

These properties have effects related to the new Kenilworth Crossing.

- CPED-Long Range Planning agrees with the effects, preliminary determination and action regarding the Kenilworth Lagoon (Grand Rounds). An impact that was discussed in the consultation meeting, but not addressed on the table of effects is vibration. Impacts to feeling, character and experience of the waterway from the effects of vibration is worth consideration.
- We agree with the effects, preliminary determination and action regarding Cedar Lake (Grand Rounds).
- We agree with the effects and actions and look forward to future consultation to determine effects on the following properties:
 - Park Board Bridge #4 (Grand Rounds)
 - Lake of the Isles Parkway (Grand Rounds)
 - Lakes of the Isles (Grand Rounds)
 - Lake of the Isles Residential District

Potential Kenilworth Corridor Channel Bridge Concepts

CPED-Long Range Planning appreciated the opportunity to briefly review the three bridge concepts developed by Kimley Horn for the project. We look forward to future consultation regarding the design of the bridges to avoid, minimize and/or mitigate adverse effects on the properties identified in Section 3.

Future consultation should not focus purely on choosing one of the three options, but focusing on the underlying assumptions behind their design and how those design assumptions address the effects identified in Section 3 of the table. We do not endorse any of the designs at this time.

Potential Shallow Tunnel Effects

The table of Preliminary Determination of Effects on Historic Properties did not address any additional vibration impacts from the construction of the Shallow Tunnel and associated infrastructure. There are several listed and eligible historic properties in APE in proximity to this infrastructure and the impacts of the shallow tunnels were not considered in prior consultation. Can you provide additional information regarding analysis on potential effects? If there is not additional information available it is worth adding continued consultation regarding these effects to the "Action" for the properties.

Sincerely,



Brian Schaffer
Principal City Planner, AICP
City of Minneapolis- CPED-Long Range Planning
105 5th Avenue South, Suite 200
Minneapolis, MN 55415
Phone: (612) 673-2670
brian.schaffer@minneapolismn.gov

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

Sent: Wednesday, January 28, 2015 11:22 AM
To: Mathis, Gregory (DOT); William.Wheeler@dot.gov; amy.zaref.ctr@dot.gov
Cc: Nani.Jacobson@metrotransit.org
Subject: RE: CIDNA 106 status

Have they provided a written request to become a consulting party to the process? If so, can you attach that request?

Thank you,

-----Original Message-----

From: Mathis, Gregory (DOT) [<mailto:greg.mathis@state.mn.us>]
Sent: Wednesday, January 28, 2015 12:00 PM
To: Wheeler, William (FTA); Sarna, Maya (FTA); Zaref, Amy CTR (FTA)
Cc: Jacobson, Nani
Subject: FW: CIDNA 106 status

All,

As mentioned during the conference call last week, we received a request from the Cedar-Isles-Dean Neighborhood Association (CIDNA) to be a consulting party for the SWLRT Section 106 review (see below). Roughly the portion of the project between the 21st Street and West Lake stations is within CIDNA's boundaries (see attached map). The following historic properties within the project APE are located in CIDNA: Neils House, Grand Rounds (Park Board Bridge No. 4 and portions of Kenilworth Lagoon, Cedar Lake, Cedar Lake Parkway, Lake of the Isles Parkway, Lake of the Isles), and a portion of the Lake of the Isles Residential Historic District. When I spoke with Mr. Westgate he indicated CIDNA would send a more detailed communication to document their interest in these historic properties, but given the number of historic properties within its boundaries, CIDNA should be granted consulting party status. Please confirm your agreement so we know whether or not to invite CIDAN to the consulting parties meeting on the 6th. Provided you agree, I will consult with SHPO to confirm their concurrence.

Thanks.

Greg

Greg Mathis
Cultural Resources Unit
Office of Environmental Stewardship
Minnesota Department of Transportation
395 John Ireland Boulevard, Mail Stop 620 St. Paul, MN 55155
Office: 651-366-4292 / Fax: 651-366-3603 greg.mathis@state.mn.us

-----Original Message-----

From: craig westgate [<mailto:cwreg@msn.com>]
Sent: Wednesday, January 21, 2015 9:56 PM
To: Mathis, Gregory (DOT)
Subject: CIDNA 106 status

Greg

Hello , I am Craig Westgate , the chair of CIDNA (cedar , isles , dean neighborhood assn.). I was told to contact you regarding the 106 process in regards to the SWLRT .

I would like to request that I be added as a "Consulting Party Status" .

As you are aware both the Kenilworth Chanel , as well as Cedar Lake Parkway are part of CIDNA so I feel it would be prudent for me to be involved .

Please let me know how I should proceed , as well as next steps .

Thank you very much.

Craig Westgate
CIDNA CHAIR
3523 St Paul Ave
Mpls Mn 55416
Sent from my iPhone

Wheeler, William (FTA)

From: Sarna, Maya (FTA)
Sent: Wednesday, January 28, 2015 6:13 PM
To: 'Mathis, Gregory (DOT)'; Wheeler, William (FTA); Zaref, Amy CTR (FTA)
Cc: 'Nani.Jacobson@metrotransit.org'
Subject: RE: CIDNA 106 status

Hi Greg,

I see the email. Thanks for pointing it out. FTA is fine adding them to the consulting party list. Please be sure to send them the 11/24 documentation package which was provided to the other parties and request feedback as required.

-----Original Message-----

From: Mathis, Gregory (DOT) [greg.mathis@state.mn.us]
Sent: Wednesday, January 28, 2015 06:54 PM Eastern Standard Time
To: Sarna, Maya (FTA); Wheeler, William (FTA); Zaref, Amy CTR (FTA)
Cc: Nani.Jacobson@metrotransit.org
Subject: RE: CIDNA 106 status

Maya,

The written request from CIDNA to become a consulting party for the Section 106 process is the email at the end of this chain, which documents their interest in Kenilworth Lagoon and Cedar Lake Parkway. Based its interest in effects on this two properties, this seems sufficient to grant CIDNA consulting party status.

If and/or when CIDNA sends a communication to confirms its interest in effects on all historic properties in the neighborhood, I will pass it along

Greg

Greg Mathis
Cultural Resources Unit
Office of Environmental Stewardship
Minnesota Department of Transportation
395 John Ireland Boulevard, Mail Stop 620
St. Paul, MN 55155
Office: 651-366-4292 / Fax: 651-366-3603
greg.mathis@state.mn.us

-----Original Message-----

From: Maya.Sarna@dot.gov [<mailto:Maya.Sarna@dot.gov>]

Wheeler, William (FTA)

From: Sarah Beimers <sarah.beimers@mnhs.org>
Sent: Monday, February 02, 2015 8:57 AM
To: Mathis, Gregory (DOT)
Cc: Wheeler, William (FTA); Sarna, Maya (FTA); Zaref, Amy CTR (FTA)
Subject: Re: Southwest LRT: consulting party request

Greg,

We concur with FTA's decision to grant consulting party status to the Cedar-Isles-Dean Neighborhood Association for participation in the Section 106 review process for the Southwest Light Rail Transit Project.

-Sarah

Sarah J. Beimers
Manager of Government Programs & Compliance | State Historic Preservation Office
Minnesota Historical Society | 345 Kellogg Blvd W | St. Paul MN 55102
tel: 651-259-3456 | fax: 651-282-2374 | e: sarah.beimers@mnhs.org

On Thu, Jan 29, 2015 at 10:54 AM, Mathis, Gregory (DOT) <greg.mathis@state.mn.us> wrote:

Sarah,

Under MnDOT CRU's authority delegated by the FTA to assist it many aspects of the Section 106 process for the Southwest Light Rail Transit Project, we have received a request from the Cedar-Isles-Dean Neighborhood (CIDNA) in Minneapolis to become a consulting party for the Section 106 process for this project (attached email). The portion of the project roughly between the 21st Street and West Lake stations is within CIDNA's boundaries (attached map). Specifically, CIDNA has documented its interest in project effects on two historic properties within its boundaries: Kenilworth Lagoon and Cedar Lake Parkway, both of which are contributing elements to the National Register eligible Grand Rounds. For your reference, there are a number of other listed and eligible properties in the project APE that are within CIDNA's boundaries. These include the Neils House, Grand Rounds (Park Board Bridge No. 4 and portions of Lake of the Isles Parkway, Lake of the Isles, and Cedar Lake,), and a portion of the Lake of the Isles Residential Historic District.

FTA has reviewed and concurs with CIDNA's request. Per 36 CFR 800.2, we request your concurrence with granting consulting party status to CIDNA.

Regards,

Greg

Greg Mathis

Cultural Resources Unit

Office of Environmental Stewardship

Minnesota Department of Transportation

395 John Ireland Boulevard, Mail Stop 620

St. Paul, MN 55155

Office: 651-366-4292 / Fax: 651-366-3603

greg.mathis@state.mn.us



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 17, 2015

Mr. Craig Westgate
Chair
Cedar-Isles-Dean Neighborhood Association
3523 St. Paul Ave.
Minneapolis, MN 55416

RE: Consulting party status; Section 106 review for the Southwest Light Rail Transit Project, SHPO No. 2009-0080

Dear Mr. Westgate,

In your email dated January 21, 2015 to the Minnesota Department of Transportation's Cultural Resources Unit (MnDOT CRU) and forwarded to the Federal Transit Administration, you requested consulting party status for the Section 106 process for the Southwest Light Rail Transit Project. After consultation with the Minnesota State Historic Preservation Office, we concur in this request and hereby offer you consulting party status to your organization.

It is our understanding that the project sponsor, the Metropolitan Council, will share with you copies of all Section 106 documents related to this project.

If you have any questions, please contact Bill Wheeler of my staff at (312) 353-2639 or William.Wheeler@dot.gov, or Greg Mathis with MnDOT CRU at (651) 366-4292 or greg.mathis@state.mn.us.

Sincerely,

Marisol R. Simón
Regional Administrator

cc: Maya Sarna, FTA
William Wheeler, FTA
Sarah Beimers, Minnesota State Historic Preservation Office
Greg Mathis MnDOT CRU
Nani Jacobson, Metropolitan Council

2 March 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on February 6, 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to review the materials provided to Sarah Beimers of the Minnesota State Historic Preservation Office and to participate in the February 6, 2015 consultant meeting about the Kenilworth Lagoon Crossing for the Southwest Light Rail Transit Project. The Kenwood Isles Area Association (KIAA) has the following comments on the materials:

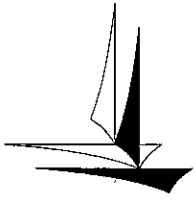
In addition to previously-expressed agreement with the Minneapolis Park and Recreation Board, MnDOT and SHPO about the adverse effects of SWLRT on the Kenilworth Lagoon area, KIAA reiterates our concern about the impact of SWLRT construction, including the Kenilworth Lagoon crossing, on the Lagoon and the historic properties of which it is part, as well as the other historic properties in Kenwood. It is not clear to us whether the noise and vibration studies account for increased truck and construction equipment traffic and operation and the resulting potential impacts on historic resources. If they do not, KIAA requests the preparation of a construction protection plan that incorporates guidance offered by the National Park Service in Preservation Tech Note #3: Protecting a Historic Structure during Adjacent Construction.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

Katherine Low
Kenwood Isles Area Association

cc: Kenwood Isles Area Association
Cedar Isles Dean Neighborhood Association
Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Halvorsen Ludt, Preservation Design Works



Minneapolis
City of Lakes

**Community Planning &
Economic Development**

105 5th Avenue S, Suite 200
Minneapolis MN 55401

Office 612-673-2597
Fax 612-673-2728
TTY 612-673-5154

March 5, 2015

Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

**RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota;
Comments from February 6, 2015 consultation on potential effects. (SHPO#2009-
0080)**

Dear Mr. Mathis,

Thank you for providing the materials included in your February 6, 2015 transmittal and February 24, 2015 submittal and facilitating the consultation meetings on February 6th and 24th. 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 preliminary determinations of effect are organized in a manner consistent with the organization presented in the matrix of effect analysis and next steps entitled "Southwest Light Rail Transit Project: Section 106 Consultation of Determination of Effect on Historic Properties, including avoidance, minimization and mitigation of adverse effects." Update 2/24/2015.

Section 1 Properties: "Historic Properties with Final Determination of Effect"

CPED-Long Range Planning agrees with the analysis of effects, preliminary determinations and associated actions, as well as identified next steps for the Minneapolis properties:

- St. Paul, Minneapolis & Manitoba RR/Great Northern Rwy. Historic District
- Osseo Branch of the St. Paul, Minneapolis & Manitoba RR Historic District
- Minneapolis Warehouse Historic District

Site 21HE0436 and Site 21HE0437: CPED Long Range Planning agrees with the analysis of effects, preliminary determinations and associated actions listed in the document. Regarding the next steps, CPED-Long Range Planning would like further consultation and discussion regarding the integration of interpretation into the design of the Royalston Station based on the results of the Phase II data recovery. We believe a better understanding of results of the recovery is required prior to committing solely to integrated interpretation at the Royalston Station. We believe interpretation should be considered and discussed, but not necessarily be the sole mitigation measure listed or

considered in the Section 106 agreement. The integration of interpretation into the design of the station is generally a good idea. However, given that the Phase II work may not be completed until after the Station Area Art and Station design is well advanced could result in interpretation that is less integrated and more of an afterthought. CPED Long Range Planning believes there may be more meaningful alternative mitigation measures that should be considered.

Section 2 Properties: Historic Properties Discussed with Consulting Parties (11/24/14)

CPED-Long Range Planning agrees with the analysis of effects, preliminary determinations and associated actions, as well as identified next steps and proposed agreement measures for the following Minneapolis properties:

- Minikahda Country Club
- Lake Calhoun (Grand Rounds)
- Cedar Lake Parkway (Grand Rounds)
- Mahalia & Zacharia Saveland House
- Site 21HE0409
- Kenwood Parkway Residential Historic District
- Kenwood Parkway (Grand Rounds)
- Frank & Julia Shaw House
- Kenwood Park (Grand Rounds)
- Kenwood Water Tower
- Mac Martin House
- Dunwoody Institute

Section 3 Properties: Historic Properties Requiring Continued Consultation on Minimization and Mitigation- Related to Crossing of the Kenilworth Crossing.

CPED-Long Range Planning agrees with the analysis of effects, preliminary determinations and associated actions, as well as identified next steps and proposed agreement measures for the following Minneapolis properties:

- Kenilworth Lagoon
- Cedar Lake
- Park Board Bridge #4
- Lake of the Isles Parkway
- Lake of the Isles
- Lake of the Isles Historic District
- Grand Rounds Historic District

Potential Kenilworth Corridor Channel Bridge Concepts

CPED-Long Range Planning appreciated the opportunity to have a more detailed presentation on the various bridge design concepts. While we appreciate the additional insight that was provided on the engineering and architecture of the various options we do not believe we've had a thorough enough conversation regarding how the various designs meet the SOI Standards and minimize impacts to the properties listed in the table. At this time, we do not endorse any of the design options that have been presented for the bridge. We look forward to future consultation regarding the design of the bridges to avoid, minimize and/or mitigate adverse effects on the properties identified in Section 3.

Thank you again for the opportunity comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Schaffer', with a long horizontal flourish extending to the right.

Brian Schaffer

Principal City Planner, AICP

City of Minneapolis- CPED-Long Range Planning

105 5th Avenue South, Suite 200

Minneapolis, MN 55415

Phone: (612) 673-2670

brian.schaffer@minneapolismn.gov

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



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparcs.org

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Superintendent
Jayne Miller

Secretary to the Board
Jennifer B. Ringold



5 March 2015

Greg Mathis
Southwest Project Office
Park Place West Building, Suite 500
6465 Wayzata Boulevard
St. Louis Park, Minnesota 55426

**RE: Comments on Section 106 elements
Southwest Light Rail Project**

Dear Mr. Mathis:

The Minneapolis Park & Recreation Board (MPRB) appreciates the opportunity to offer comments on elements of the Southwest Light Rail Transit (SWLRT) Project related to the Section 106 review. Comments addressed by this letter focus on the Kenilworth Channel and impacts of the SWLRT project on the Grand Rounds, both of which fall under the jurisdiction of the MPRB.

The context of the Kenilworth Channel and the Kenilworth Corridor is complex in that both were constructed features that have acquired their present character with time. The MPRB desires that the current character be perpetuated as much as possible recognizing the significant work required to implement the project. In defining a desired character, elements including LRT-related infrastructure, bridges over the channel, existing channel structures, and vegetation become important. In the ways these elements are considered, it is the experience of channel and corridor users along with views into the Kenilworth Corridor from Cedar Lake Parkway that becomes significant. As new elements are introduced to the settings of the channel or corridor, the MPRB desires they be authentic to their period of introduction and not mimic existing elements, historic or otherwise.

LRT-related infrastructure in the Kenilworth Corridor

The MPRB understands the introduction of SWLRT results in new elements being introduced to the corridor and desires these features to be designed to pose as minimal a change in the corridor as possible. As a result, a tunnel portal (for example) would be a designed element, but not become a feature. As a designed element, its profile would match as closely as possible surrounding grade and protective barriers would be as minimalist as possible while meeting SPO design criteria. Any portions of the portal above surrounding grade would be minimized to reduce its visual mass. Details of the design would focus on simplicity and authenticity to the materials used, with no ornamentation or application of faux materials. While MPRB understands the portal has not been designed, we anticipate it to be a minor visual element and as much of a background element as possible, especially

when viewed from Cedar Lake Parkway. Screening with landscape materials may be beneficial, but the MPRB would not consider landscape materials to be a strategy that, on its own, would satisfy our desires to reduce the impact of the portal.

Other LRT-related and supporting elements may pose visual impacts, but are likely less able to be changed due to their function. The MPRB desires that other LRT-related infrastructure, such as trackside control equipment, be placed to limit their visual impact, with vegetative screening used to further reduce their visual impact. Should those elements need to be secured, MPRB prefers simple, not ornamental, fencing materials that limits their visual presence. As mentioned for the tunnel portal, we would not consider landscape screening to be a strategy that reduces impacts.

For the MPRB, views into the Kenilworth Corridor from Cedar Lake Parkway are significant. Minimizing the sense of change resulting from the introduction of LRT should be the goal, with the primary impacts being visual. Where new introductions are made, their design should clearly reflect their function, their placement should be strategized to limit their prominence, and screening, if used, should not introduce new or unnecessary elements to the view.

Bridges over the Kenilworth Channel

The design of bridges spanning the Kenilworth Channel is the subject of a Memorandum of Understanding approved by the MPRB Board of Commissioners on 4 March 2015 and proposed for consideration by the Metropolitan Council on 11 March 2015. The memorandum includes a document describing the schedule and principles of a collaborative design process aimed at developing a range of bridge design concepts. As of the date of this letter, that process has been initiated. It is expected that bridge concepts resulting from that process will be assessed for alignment with requirements of the Section 106 process.

In reaching agreement with the Metropolitan Council through the Memorandum of Understanding approved by its Board of Commissioners on 4 March 2015, the MPRB aims to create a bridge that is of its own time, with materials that are used authentically, and most important, results in a bridge design inspired by the experience of those who might engage it. Accordingly, bridge designs may be generated following these conceptual design principles:

- a) Bridges are defined primarily by structural design requirements, and considering, at a minimum:
 - Separation of freight, LRT, and trail bridges
 - Exploration of pier and deck configurations aimed at reducing piers in the channel while maintaining desired vertical clearances in the channel
 - Use of other structure types based on structural requirements (loading, deflection)
- b) Bridges are defined primarily by the context of the channel and its users, and considering, at a minimum:
 - User-focused experience with few or no penetrations of the channel
 - Elimination of roosts on the underside of the bridge or piers
 - Minimization of continuous deck expanse in order to bring more light to channel
- c) Bridges are defined primarily by the context of the Grand Rounds, and considering, at a minimum:
 - Reference to other bridges in the Chain of Lakes Regional Park, using the form, scale, materials, color, and details to influence the design without mimicry

- Creation of a contrast with historical channel elements (WPA walls) to clearly separate the newly introduced structures from those elements currently considered contributing to its historic nature
 - Recognition that there was no trail bridge at this location, that the railroad bridge that was constructed does not match other nearby railroad bridges, and that new bridges may not need to reference those other structures
- d) Bridges are defined primarily by their relationships to one another, and considering, at a minimum:
- Creation of a series of bridges all based on the same structural system, style, mass, and detail (no distinction by use)
 - Establishment of freight and rail bridges based on the same structural system, style, mass, and detail, with a trail bridge employing a different structural system, style, mass, and detail (distinction by use)
 - Creation of a “family” of structures, focused on coherency but allowing each to be different based on structure type and use

The MPRB engaged a consulting team to consider alternatives to a bridge crossing of the Kenilworth Channel and to assess the impacts of bridge and tunnel crossings. The consultant’s report¹ includes a section on historic assessment that references the visions of early park commissioners for bridges in what was to become the Chain of Lakes:

It took many decades for the [Minneapolis park] system to be built out. An early priority was the Chain of Lakes. In a series of construction campaigns, the lakes were dredged, the shores planted, and parkways established in the late nineteenth and early twentieth centuries. Some of the lakes were linked with manmade canals, equalizing differences in elevation. Creation of the canals made it necessary to erect bridges for pedestrians, vehicles, and trains. The park commissioners hoped that these bridges would be “of a permanent, modern and durable construction, preferably reinforced concrete with attractive facing. They should be ornamental in design and in keeping and harmony with the landscape.” Railroad companies, however, were reluctant to invest in aesthetics, which sometimes delayed commitments for long-term solutions to their crossings.

In assessing the impacts of channel crossing alternatives, the MPRB consultant report further states, in part:

Developing an appropriate design for the proposed bridges over the Kenilworth Channel presents a challenge. When the park commissioner[s] created the channel in the early twentieth century, they hoped that ornamental bridges would span the waterway. That is not, however, what happened. If the original railroad bridge and Bridge No. 6 had survived, they would be considered contributing parts of the Grand Rounds Historic District, despite the fact that their appearance disappointed contemporaries. Because these bridges have been replaced with newer structures, they have been determined to be non-contributing to the district. The design and

¹ Appendix I – Historical Impacts to a report related to an investigation of Kenilworth Channel Alternatives, prepared by Brierley Associates for the Minneapolis Park & Recreation Board; Memorandum to Jim Herbert, Barr Engineering from Charlene Roise, Hess, Roise and Company, Historical Consultants; Kenilworth Channel Alternatives Assessment: Historical Impacts; dated February 23, 2015

materials that would be most sympathetic to the historical pattern would be a timber-trestle structure. This, however, would be the most damaging to the setting and feeling of the Grand Rounds and Lake of the Isles Residential Historic Districts and Bridge No. 4.

The consultant's report finally states:

If the channel is bridged, the design of the structures should be a balance between minimizing the structure's size and minimizing its visibility. Hence, a long span—as opposed to a trestle—will be the least intrusive for those using the channel, helping to counter the expanded covered length of the channel by opening up its width. At the same time, for those viewing the bridge's elevations, the design should blend with its naturalistic setting rather than take inspiration from the ornamental bridges that were historically installed in other locations.

Importantly, the MPRB, as stated in its consultant's report excerpted above, does not desire an object drawn from another time and placed in this location.

The MPRB is working with Southwest Project Office staff to clarify or confirm dimensions and key relationships intended for nearby bridges and to establish parameters for "benches" on at least one side of the channel that would allow for pedestrian passage under the new bridges. A similar "bench" might be considered to allow for terrestrial species movement along the banks of the channel and under the new bridges. It is intended that those dimensions and relationships be used as a guide for the design of these new bridges, much as they were used as criteria in a design competition for the bridges

Existing Kenilworth Channel structures

The MPRB values the history of the channel and believes the structures originally constructed to retain its banks should be perpetuated, even though they have degraded with time. If resources were less limited for the MPRB, restoration of these structures would be more of a priority, as it has been for more visually prominent walls and bank structures in nearby waterways, particularly at the Lagoon between Lake Calhoun and Lake of the Isles. To the extent the structures along the Kenilworth Channel are disturbed by construction activities related to SWLRT, the MPRB desires repair or replacement to match as closely as practicable the originally constructed structures. If repair or replacement is not practicable, the MPRB desires new structures be implemented using modern materials and methods, and following as closely as practicable the lines, elevations, and dimensions of the existing (or originally constructed) bank structures in order to clearly distinguish the historic presence and integrity of the existing walls.

The MPRB does not desire the patterns, materials, or details of these bank structures to be used in other parts of a designed improvements of the channel or corridor, unless a clear relationship in intent and need can be demonstrated between the bank structures and any similar new element.

Corridor and channel vegetation

Though time, the channel has come to include open lawn areas reaching to its banks and volunteer vegetation that has assumed a more naturalized condition. In the area of the SWLRT crossing, the pattern of naturalized bank vegetation, with clear vegetative density relative to the open qualities of the channel itself, becomes a character-defining feature. For the trail corridor, similar qualities of naturalized edges become important, especially when contrasted with the generally open conditions along the corridor between Cedar Lake Parkway and the Kenilworth Channel. In both cases, it's a landscape organized only to the extent that vegetated edges contrast strongly with the open qualities of

the corridor or channel. The vegetation is naturalized, not ornamental, and the clearly defined edges between vegetated and non-vegetated areas reinforce the linear qualities of the corridor and channel as recreational passages.

Where construction activities disturb or disrupt the landscape along the channel or the corridor, the MPRB would prefer restoration that eliminates invasive species but perpetuates a clear and naturalized edge using species native to the Kenilworth area.

It's important to note that no plans have been defined for the corridor or channel landscape, but the MPRB understands the Southwest Project Office has or will engage a Kenilworth Landscape Design Consultant to develop plans for corridor's landscape. The MPRB has been invited to participate in guiding that design process. As those plans evolve, the opportunities for a more planned landscape might suggest patterns other than those described above take precedence; while the MPRB believes it is important to retain the natural setting of the channel in order to perpetuate its quietude and serenity, the landscape of the corridor may evolve to result in a more definitive and place-related landscape, instead of the more volunteer-based landscape evidenced in the corridor today.

The MPRB appreciates the opportunity to comment on the designed elements of the SWLRT project, especially as it impacts upon parks and park resources under our jurisdiction. Please feel free to contact me should you have any questions.

Sincerely,

Minneapolis Park & Recreation Board

A handwritten signature in black ink, appearing to read "Michael Schroeder", followed by a period.

Michael Schroeder
Assistant Superintendent for Planning Services

STATE HISTORIC PRESERVATION OFFICE

March 9, 2015

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

We are continuing consultation on the above project which is being 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.

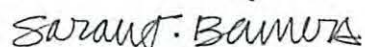
Thank you for providing an update regarding final determinations of effect which are anticipated to be made by the Federal Transit Administration (FTA) prior to publishing the Supplemental Draft Environmental Impact Statement. It is also our understanding that a draft Section 106 agreement document will be included in the Final Environmental Impact Statement. We agree that the proposal for ongoing, regular meetings with all identified consulting parties, as outlined in your February 3rd correspondence is appropriate, and we look forward to participating in these meetings.

As you know, the first of such meetings was held recently on February 6th and this discussion was primarily focused on the new light rail crossing structure which is proposed to be constructed over the Kenilworth Lagoon/Channel which is a contributing element to the Grand Rounds Historic District, a property that has previously been determined eligible for listing in the National Register of Historic Places. At this point, we feel that the designs presented thus far provide a starting point upon which we will continue consultation seeking ways to avoid, minimize, or mitigate potential adverse effects to the historic property.

We look forward to continuing consultation regarding the design of this new crossing structure.

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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

23 March 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on 24 February 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the February 24, 2015 consultant meeting and to review the revised provided at that meeting. The Kenwood Isles Area Association (KIAA) has the following comments on the materials:

1. KIAA agrees that light from the trains will not adversely impact Kenwood's historic resources.
2. *Grand Rounds Historic District (GRHD) (XX-PRK-001)*: KIAA agrees with the preliminary determination of Adverse Effect for the Grand Rounds Historic District and would like to stress a very important point made by the SHPO during recent consultants' meetings—an adverse effect to a historic resource in a district is an adverse effect that impacts the entire district. KIAA looks forward to continuing consultation on the Grand Rounds Historic District.
3. *Kenwood Parkway Residential Historic District (HE-MPC-18059)*: The updated "Section 106 Determination of Effects on Historic Properties" table states that noise analysis results indicate that "most of this district is outside the limits of noise impacts," and that "a few residences near the northern end will be assessed for noise impact..." KIAA looks forward to continuing consultation and expresses concern on the following issues:
 - a. KIAA remains concerned that auditory impacts from train operation, traffic, and project construction will adversely impact this resource. National Register of Historic Places (NRHP) criteria include an assessment of integrity with regard to "setting" and "feeling." These qualities are less tangible than those of "design" or "workmanship," but are no less important. Audible intrusion may alter the physical environment of Kenwood's historic resources and the sounds associated with modern rail infrastructure may alter the characteristics that make the district eligible for the NRHP.
 - b. KIAA would like to stress that an adverse effect on a contributing element of a district is considered an adverse effect to the entire district.
 - c. KIAA will review the noise and vibration analysis for construction upon completion.
 - d. KIAA is concerned that increased traffic and changes in traffic and parking

patterns will alter the integrity of setting and feeling of the Kenwood Parkway Residential Historic District. KIAA will review the traffic analysis upon completion.

- e. KIAA would like more details on what will be included in the “project-wide construction plan.”
4. *Kenwood Parkway (HE-MPC-01796)*: KIAA agrees that “the provision of access routes to [Penn] station from Kenwood Parkway (including the existing trail from the foot of Kenwood Hill along the south side of I-394, and potential additional routes as illustrated by the conceptual trail in the Southwest Corridor Investment Framework report) may result in...indirect visual effects resulting from the changes to its setting...” KIAA looks forward to continuing consultation and expresses concern on the following issues:
 - a. Kenwood Parkway is eligible for the NRHP as a contributing element of the Grand Rounds Historic District under Criterion A and C for “community planning and development,” “entertainment/recreation,” and “landscape architecture.” KIAA is concerned that auditory impacts from train operation and project construction and the “changes to its setting” identified in the determination of effects on historic properties table will adversely affect the integrity of setting, feeling, and design that make Kenwood Parkway eligible for the NRHP.
 - b. KIAA will review the noise and vibration analysis for short-term impacts when complete.
 - c. KIAA is concerned that increased traffic and changes in traffic and parking patterns will alter the integrity of setting and feeling that make Kenwood Parkway eligible for the NRHP. KIAA will review the traffic analysis when complete.
 - d. KIAA would like more details on what will be included in the “project-wide construction plan.”
 5. *Kenwood Park (HE-MPC-1797)*: KIAA agrees that potential changes to traffic and parking patterns as a result of the operation of the 21st Street Station may impact Kenwood Park. KIAA looks forward to continuing consultation.
 - a. Kenwood Park is eligible for the NRHP as a contributing element of the Grand Rounds Historic District under Criterion A and C for “community planning and development,” “entertainment/recreation,” and “landscape architecture.” KIAA is concerned that auditory impacts and changes in traffic and parking patterns will adversely affect the integrity of setting and feeling that make Kenwood Park eligible for the NRHP.
 - b. KIAA will review the noise and vibration analysis for short-term impacts when complete.
 - c. KIAA will review the traffic analysis when complete.
 - d. KIAA would like more details on what will be included in the “project-wide construction plan.”
 6. *Kenilworth Lagoon (HE-MPC-1822)*: KIAA agrees with the finding of adverse effect on the Kenilworth Lagoon/Channel and looks forward to continued consultation on the design of the crossing and bridge and the following:
 - a. In addition to the adverse effects already identified, KIAA is concerned that the sounds associated with modern rail infrastructure will alter the

characteristics of "community planning and development," "entertainment and recreation," and "landscape architecture" that make the lagoon eligible for NRHP designation.

- b. KIAA is pleased to see that "a construction plan that identifies measures to be taken during construction to protect Kenilworth Lagoon elements and other historic properties in the vicinity to ensure that they are not disturbed by any project related activities (including construction related vibration, storage yards, and staging areas.)" We ask that "construction related traffic" be identified as a specific "project related" activity. Further, KIAA understands "other historic properties in the vicinity" to include the Kenwood Water Tower and all of the historic resources listed above.

KIAA would like to propose landscaping throughout the Kenilworth Corridor as one means of mitigating the adverse impact of noise on Kenwood's historic properties. We look forward to continuing consultation on this means of mitigation.

Thank you for continuing to work to answer KIAA's questions regarding traffic and noise impacts and for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,



Katherine Low
Kenwood Isles Area Association

KL/thl

cc: Kenwood Isles Area Association
Cedar Isles Dean Neighborhood Association
Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office

24 March 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Cedar-Isles-Dean Neighborhood Association (CIDNA) Comments on 24 February 2015
Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the February 24, 2015 consultant meeting for the Southwest Light Rail Transit Project and to review the Section 106 materials provided at that meeting. The Cedar-Isles-Dean Neighborhood Association (CIDNA) has the following comments on the materials:

Section 106 Consultation on Determination of Effects on Historic Properties Table (Updated 2/24/2015)

- 1) *Cedar Lake Parkway (eligible, contributing) HE-MPC-1833*: No adverse effect is indicated based on preliminary engineering plans for a shallow tunnel requiring reconstruction of part of the parkway, as well as the potential introduction of operational auditory effects of LRT trains entering and existing the shallow tunnel. CIDNA does not concur with this preliminary determination of no adverse effect. Cedar Lake Parkway is considered eligible for the National Register of Places under Criteria A and C for community planning and development, entertainment and recreation, and landscape architecture. The integrity of these areas of significance will likely be adversely effected by the introduction of the light rail project: additional signage could alter the design, the traffic going in and out of the tunnel could alter the feeling, the exits could alter the setting, rendering Cedar Lake Parkway ineligible for listing. CIDNA will continue to consult on the design with the intent of achieving a final determination of no adverse effect.
 - a. CIDNA concurs with concerns raised by MPRB in consultation letters dated 5/16/2014 and 12/12/2014 regarding the long-term noise and visual intrusion at this intersection and its impacts on adjacent parkland.
 - b. CIDNA would like to better understand how the requirements of the 'quiet zone' will be upheld during and after construction.
 - c. CIDNA welcomes the opportunity to continue consultation on this intersection, including reviewing and commenting on 60% and 90% design plans.

- 2) *Kenilworth Lagoon (eligible, contributing) HE-MPC-1822*: Both direct and indirect adverse effects are indicated based on preliminary engineering plans. CIDNA will continue to consult on the design of the new light rail, freight rail, and trail bridges over the lagoon, destruction to part of the contributing WPA retaining wall, and introduction of operational noise.
 - a. CIDNA plans to review and comment on the forthcoming noise analysis for operation if it is determined that Kenilworth is a noise sensitive receptor.
 - b. CIDNA plans to review and comment on the forthcoming construction protection plan that identifies measures to be taken during construction to protect the Kenilworth Lagoon.
 - c. CIDNA plans to continue consultation regarding the design of the bridge and other project elements to minimize visual effects on the resource.
 - d. CIDNA looks forward to continued consultation on measures to minimize and mitigate adverse direct and indirect effects.

- 3) *Cedar Lake (contributing element to Grand Rounds Historic District) HE-MPC-1820*: No adverse effect is indicated based on preliminary engineering plans. CIDNA does not concur with this preliminary determination of no adverse effect. Cedar Lake Parkway is considered eligible for the National Register of Places under Criteria A and C for community planning and development, entertainment and recreation, and landscape architecture. The integrity of these areas of significance will likely be adversely effected by the introduction of the light rail project: the setting and feeling of South Beach, in particular, are likely to be adversely impacted. CIDNA will continue to consult on the design of the new bridges over the Kenilworth Lagoon and trail improvements from 21st Street to East Cedar Beach.
 - a. CIDNA plans to review and comment on the forthcoming analysis of construction and operational noise impacts that will be documented in the FEIS, should Cedar Lake be determined a noise sensitive receptor.
 - b. CIDNA looks forward to continued consultation during the design of the project elements near Cedar Lake to minimize visual effects to its setting, critical to the integrity of this resource.

- 4) *Park Board Bridge #4 (contributing element to Grand Rounds Historic District) HE-MPC-6901*: No adverse effect is indicated based on preliminary engineering plans. CIDNA agrees with the SHPO's concerns regarding this resource, specifically that a "sensitive" design for the crossing at the Kenilworth Channel does not necessarily indicate "no adverse effect" as the views, and therefore the historical setting, from Park Bridge #4, are still altered. CIDNA will continue to consult on the design of the new bridges over Kenilworth Lagoon to avoid adverse effects on this resource.
 - a. CIDNA looks forward to continued consultation regarding the design of the Kenilworth Crossing and other project elements to avoid visual effects on the bridge.

- 5) *Lake of the Isles Parkway (eligible, contributing) HE-MPC-1825*: No adverse effect is indicated based on preliminary engineering plans. CIDNA will continue to consult on the design of the new bridges over Kenilworth Lagoon to avoid adverse effect on this resource.
 - a. CIDNA looks forward to continued consultation during the design of Kenilworth Crossing to avoid adverse visual effects to the setting of Lake of the Isles Parkway.

- 6) *Lake of the Isles (eligible contributing) HE-MPC-1824*: No adverse effect is indicated based on preliminary engineering plans. CIDNA will continue to consult on the design of the new bridges over Kenilworth Lagoon to avoid adverse effect on this resource
 - a. CIDNA looks forward to continued consultation during the design of Kenilworth Crossing to avoid adverse effect on Lake of the Isles.

- 7) *Lake of the Isles Residential Historic District (eligible) HE-MPC-9860*: No adverse effect is indicated based on preliminary engineering plans. CIDNA will continue to consult on the design of the new Kenilworth Lagoon crossing to avoid adverse effect to the historic district's visual character and setting, as well as to avoid adverse changes in noise and traffic patterns in the district.
 - a. CIDNA looks forward to continued consultation during the design of Kenilworth Crossing to avoid adverse effect on the portion of the historic district within the APE.

- 8) *Grand Rounds Historic District (GRHD) (eligible) HE-PRK-001*: Both direct and indirect adverse effects are indicated based on preliminary engineering plans. CIDNA will continue to consult on the design and construction of new project elements in the historic district, destruction of distinctive features, spaces and spatial relationships within the Kenilworth Lagoon, and alteration of distinctive features, spaces and spatial relationships. Additionally, CIDNA will continue to consult on permanent changes to the historic district's visual character and setting, as well as the introduction of new features that may or may not be compatible with the GRHD with regard to size, scale, proportion, massing, materials and aesthetic character.
 - a. CIDNA plans to review the forthcoming noise and vibration analysis for construction.
 - b. CIDNA plans to review the forthcoming noise and vibration analysis for the project's construction, should the GRHD be determined a noise sensitive receptor.
 - c. CIDNA plans to review the forthcoming traffic analysis that will be completed as part of the FEIS.
 - d. CIDNA concurs with the statements made by SHPO representative Sarah Beimers at the 2/24/2015 consultant meeting asserting that an adverse effect on any contributing historic resource within a district is effectively an adverse effect on the district as a whole.

In addition to the items listed above, CIDNA looks forward to the opportunity to review and comment on the project-wide construction protection plan.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review.

Best regards,

Craig Westgate
Cedar-Isles-Dean Neighborhood Association

Cc: Cedar-Isles-Dean Neighborhood Association
Kenwood Isles Area Association
Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Halvorsen Ludt, Preservation Design Works



Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

Office Tel: (651) 366-4292

Fax: (651) 366-3603

greg.mathis@state.mn.us

May 4, 2015

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

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Phase I Archaeological Survey:
Eden Prairie Segment Areas A and B, and Minneapolis Segment Holden-Royalston Parcel
(21HE0409), SHPO #2009-0080

Dear Ms. Beimers,

We are writing to continue consultation regarding the identification of historic properties for the Southwest Light Rail Transit Project (Project). Following standard practice, all Section 106 consulting parties for the Project are copied on this letter.

Enclosed is a report on a Phase I archaeological survey completed by 10,000 Lakes Archaeology (February 2015) for three areas along the Project corridor, two in Eden Prairie and one in Minneapolis. The survey of the two areas in Eden Prairie was based on the results of a Phase 1a investigation reported in *Phase 1A Archaeological Investigation, Southwest Light Rail Transit, Hennepin County, Minnesota: SDEIS Areas: Eden Prairie Segment, Hopkins Operations and Maintenance Facility, and St. Louis Park / Minneapolis Segment* (106 Group, March 2014), which was submitted to your office for review on May 8, 2014, and to which your office concurred on June 5, 2014. The Phase 1a investigation recommended field survey of three areas within the Eden Prairie Segment: Areas A, B and C. The results of the Phase I survey for Area C were submitted for review on October 3, 2014, and your office concurred on November 7, 2014. The results of the Phase I survey of Areas A and B are presented in the enclosed report. Based on the findings of the Phase I survey, we have determined that Areas A and B are not eligible for the National Register of Historic Places (NRHP) and request your concurrence.

The third area surveyed and documented in the enclosed report is the Holden-Royalston parcel in Minneapolis. This area was added to the archaeological Area of Potential Effect (APE) in October 2015 as a result of a shift in the Project alignment. Both a Phase Ia and Phase I survey were completed for this area. The Phase I survey identified one historic archaeological site (21HE0452), which is recommended for a Phase II evaluation. We are initiating the Phase II survey of this site to determine its eligibility for the NRHP and expect the evaluation to be completed this summer.

Please submit any comments on the report within 30 days of this letter. We look forward to continuing to consult with your office as project planning moves forward. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Mathis'.

Greg Mathis
MnDOT Cultural Resources Unit

Enclosures: *Archaeological Investigations For the Southwest Light Rail Transit Project: Areas A and B, and the Holden-Royalston Parcel (10,000 Lakes Archaeology Inc., February 2015)*

cc (via email): Bill Wheeler, Federal Transit Administration
Maya Sarna, Federal Transit Administration
Amy Zaref, Federal Transit Administration
Melissa Jenny, United States Army Corps of Engineers
Brad Johnson, United States Army Corps of Engineers
Liz Abel, Minnesota Department of Transportation
Nani Jacobson, Metropolitan Council
Caroline Miller, Metropolitan Council
David Jaeger, Hennepin County
John Doan, Hennepin County
Kim Zlimen, Hennepin County
Lori Creamer, City of Eden Prairie
Regina Rojas, City of Eden Prairie
Nancy Anderson, City of Hopkins
Brian Schaffer, City of Minneapolis
John Byers, City of Minneapolis
Elise Durbin, City of Minnetonka
Meg McMonigal, City of St. Louis Park
Jennifer Ringold, Minneapolis Park and Recreation Board
Bill Walker, Three Rivers Park District
Kathy Low, Kenwood Isles Area Association
Craig Westgate, Cedar-Isles-Dean Neighborhood Association
Tamara Ludt, Preservation Design Works

15 May 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on 22 April 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the April 22, 2015 consultant meeting and to review the revised materials provided at that meeting. The Kenwood Isles Area Association (KIAA) has the following comments on the materials:

- 1.KIAA does not have a preference with regard to the placement of the Kenilworth bridge piers or thickness of the span. We were informed at the meeting that each design would generate similar auditory impacts. We hope that designers will continue to be vigilant about the setting and feeling of the historic channel, including minimizing audible intrusions and sounds associated with modern rail infrastructure that may alter the park-like setting of the lagoon, a vital element of its historic character.
- 2.KIAA does not support Bridge Configuration 4B-Skew. Though we appreciate the creativity of the proposal, we assert that the bicycle and pedestrian trail in this design would needlessly increase the impact on private residences that abut the HCRRRA property.

Thank you for continuing to work to answer KIAA's questions regarding area impacts and for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

Jeanette Colby
Kenwood Isles Area Association

cc: Kenwood Isles Area Association
Cedar Isles Dean Neighborhood Association
Jennifer Ringold, Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Ludt, Preservation Design Works



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparcs.org

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Jennifer B. Ringold



May 27, 2015

Mr. Greg Mathis
Southwest Project Office
Park Place West Building, Suite 500
6465 Wayzata Boulevard
St. Louis Park, Minnesota 55426

RE: ***Minneapolis Park & Recreation Board comments on the Section 106 consultation process and potential effects related to the SWLRT bridges at the Kenilworth Channel***

Dear Mr. Mathis:

The Minneapolis Park & Recreation Board (MPRB) appreciates the opportunity to offer comments on the proposed bridges over the Kenilworth Channel related to the Southwest Light Rail Transit (SWLRT) project. Our insights are based partially on reviews offered by the Southwest Project Office (SPO) at a meeting held on April 22, 2015, but the MPRB has, through a Memorandum of Understanding (MOU) executed with the Metropolitan Council, gained additional insights upon which our comments are founded. The MPRB's comments focus on several areas that were prominent in the MOU, including bridge configurations, channel context, historic context, and bridge relationships.

Bridge configurations

The MPRB reviewed design concepts prepared by the SPO in November 2014 and questioned the need to maintain a 14-foot clearance under the bridges. Recognizing the impacts this clearance has on the Kenilworth Channel, MPRB staff suggested that a lesser clearance—one aligned with directives for original bridges established by Theodore Wirth, former Superintendent of Parks for the Minneapolis Board of Park Commissioners—might allow for a superior design from the perspective of the channel. Research indicated a clearance established by Wirth that, when translated to contemporary datum elevations, results in a clearance of 10.6 feet. MPRB staff supports this redirection of baseline parameters of the design for the bridges, although the greatest practicable clearance is desired.

A change to parameters for clearance provides a bridge with fewer intrusions into the channel itself. As the channel is considered the historic resource, not the bridges, the MPRB views this as a significant improvement when compared to the previous bridge proposals and to the existing trestle bridge located at the channel.

The MPRB supports design configurations that reduce direct impacts to the Kenilworth Channel, particularly related to the number of piers in the water. Concepts shared by SPO include a trail bridge that is separated from the LRT

bridge, resulting in a trail bridge that spans the channel without pier support. This direction, in particular, is strongly supported by the MPRB.

Channel context

The MPRB believes preference should be directed to the Kenilworth Channel as the primary resource when impacts are considered. It is not only a historic feature but is one that is more directly impacted by the introduction of a bridge supporting LRT through additional deck coverage. To the extent that bridges can be separated in ways that introduce more light to the channel, MPRB believes a more favorable design is achieved. Configurations explored by the SPO include a skewed trail bridge, which the MPRB believes should continue to be studied and considered until and unless it is clearly demonstrated as having a negative impact on adjacent or nearby residential properties. To date, it has not been demonstrated as having such an impact, but it is clear that even a slight skew offers the opportunity to increase the amount of natural daylight reaching the channel.

Historic context

The extant bridge is not one upon which a new design for a bridge should be based. The trestle bridge was never intended to be permanent and while a design for the bridge bearing a relationship to other bridges on the Chain of Lakes might have been anticipated in Wirth's time for the railroad bridge over the channel, such a bridge was never implemented. To use an unimplemented design for the basis for design of bridges implemented as part of the SWLRT project would present a false history for the channel crossing. Still, Wirth's writings suggest directions that resonate with history without mimicry. He suggested, "If concrete bridges are to be built then the designs should be of the simplest possible character, without any attempt at ornamentation." He further noted, "Let those concrete bridges show graceful, pleasing lines, be true in character to their construction, and let their modesty and simplicity of design be one of their strongest features." Considering these directives, the MPRB takes no exception to the concept designs proposed, and also believes the introduction of a steel structure for the trail bridge could be supported as its use of the material is honest and simplistic in both structure and form.

Bridge relationships

The introduction of the LRT bridge at the channel adds some complexity to the composition of bridges. However, the MPRB believes the LRT and freight rail bridges bear a similarity suggesting complementary design, while the trail bridge, because of its clearly different requirements for loading and deflection, could be either similar or strikingly different in materials, form, and overall design. From that perspective, the MPRB takes no exception to the concept designs.

Several features related to the bridges have not been defined and the MPRB withholds any response to those features until a design is clearly demonstrated. Features or components such as the channel walls, slope paving at bridge abutments, landscape restoration, and bridge railings need definition. In addition, the methods of controlling noise have yet to be fully explored and may impact upon the design. As noise mitigation is considered, the MPRB reserves the opportunity to introduce comments that may support or negate any statements offered in this letter.

Other features of the SWLRT project may also be of interest to the MPRB but have not been fairly demonstrated in current concepts. The tunnel portal and its visual impact needs to be defined by SPO so that the MPRB can consider the ways it influences the experience of park users on the Kenilworth Trail

and views from Cedar Lake Parkway. An expansive retaining wall on the north side of the corridor and supporting the freight rail tracks has the potential to detract from the channel. Design directions for this wall have yet to be demonstrated.

Four bridge concept designs prepared by SPO were shared with the MPRB at a meeting of the Board of Commissioners on May 20, 2015. The intent was not to deliberate the merits of any particular design or ask the commissioners to define a preference, but rather to allow for early insights for bridge directions. The commissioners noted no particular exceptions to the design directions presented as a part of the meeting, nor did they indicate a preference for any of the concepts.

The MPRB looks forward to refinements of the bridge design concepts. Please let me know if you have any questions related to the content of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Schroeder", followed by a period.

Michael Schroeder
Assistant Superintendent for Planning
Minneapolis Park & Recreation Board

STATE HISTORIC PRESERVATION OFFICE

May 28, 2015

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

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

We are continuing consultation on the above project which is being 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.

Our office participated in a Section 106 consultation meeting for this project on April 22, 2015. At this meeting your agency presented and submitted the new bridge configurations for the proposed crossing structures over Kenilworth Lagoon/Channel – to supplement the Bridge Design Concepts presented in February 2015 - for review and comment by our office and participating consulting parties. In addition, we also briefly discussed proposed mitigation for the adverse effects to archaeological sites 21HE0436 and 21HE0437 but, due to the fact that there were no representatives present from the City of Minneapolis, it was decided to defer additional consultation regarding resolution of adverse effects to these sites to a later meeting.

We have been continuing consultation under the premise that your agency has determined that there is a potential adverse effect to the Grand Rounds Historic District which will be caused by the proposed construction of new crossing structures over the Kenilworth Lagoon/Channel, a contributing element in the historic district. It is our understanding that final effect determinations will be made by the Federal Transit Administration later this calendar year, but that we will continue to consult regarding the design of these crossing structures in an effort to minimize adverse effects.

We offer the following comments and recommendations, taking into account information presented at the consultation meeting on April 22 and our subsequent review of the documents submitted, including:

- *Bridge Design Concepts and Configurations Considered* (Table), Draft 4/22/2015
- Plan views, section views, profile views, and sketches of the revised crossing configurations 4A, 4B, 4C, and 4B-Skew (Plans), Draft April 2015

It is our understanding that the additional configurations build upon the original proposal for two crossing structures at this location (one with combined pedestrian/bicycle trail and light rail and the second with freight rail) and propose a split of the combined trail/light rail structure thus creating two separate crossing structures for the trail and light rail thus bringing the total number of structures at this location to three. While we understand the benefit of this proposal as it relates to minimizing potential impacts to park users at the waterway level, primarily by creating less of a tunnel-like structure above, it is our opinion that the added physical presence of this new infrastructure on the landscape will not minimize the potential adverse effect to the historic property as a whole.

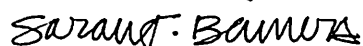
Although the proposed splitting of proposed crossing structures into three separate elements will only increase the amount of new construction by five feet, we feel that this proposal is moving in the wrong direction. If the agency's effort is to minimize adverse effects, then adding additional infrastructure does not achieve this goal.

The extreme example of this is presented in the Configuration 4B-Skew which is the most intrusive design of the four options. This is primarily due to the fact that it would not only increase the physical impact to the historic property by the greatest extent with a larger footprint of new crossing infrastructure, but also that construction of this alternative would result in additional land acquisition, tree removal, and grading. We appreciate the fact that the submittal included plans, cross sections and profile views which provide at least an initial understanding of the potential impacts of the proposed crossing structures as a whole, including wing walls, retaining walls, ballast curbs and grading, required for each design. Although there are some design elements in each of the Configuration 4A, 4B, and 4C options presented, including thinner bridge decks and staggered pier placement (thus avoiding another type of tunnel effect at the water level), we do not have a preference for one single design as currently presented.

Overall, in order to minimize adverse effects, if this is possible, we recommend that your agency pursue a design solution which may include a combination of the most minimal design elements – including a reconsideration of the original two-bridge crossing option - including pier numbers and configuration, deck thinness, wing walls, and retaining walls. Also, take into consideration the importance of avoiding direct adverse impacts (which may include removal during construction and/or obscuring access/views by new crossing structures) to the historic WPA retaining walls located along the edge of the channel. If direct impact avoidance cannot be achieved then the most minimal treatment of these features should be considered, including selective rehabilitation or restoration in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*.

We look forward to continuing consultation on this aspect of the project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

June 1, 2015

Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota; Comments from April 22, 2015 consultation on potential effects. (SHPO#2009-0080)

Dear Mr. Mathis,

Thank you for providing the materials from the April 22, 2015 meeting. The City of Minneapolis 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 has reviewed materials provided as part the April 22, 2014 including the four new bridge configurations for the Kenilworth Channel/Lagoon Crossing. We look forward to continued consultation as the bridge designs evolve to avoid, minimize and/or mitigate adverse effects on properties.

CPED-Long Range Planning looks forward to continued discussion and consultation regarding the mitigation and potential interpretation of the Sites 21HE0436 and 21HE0437.

Thank you again for the opportunity comment.

Sincerely,



Brian Schaffer
Principal City Planner, AICP
City of Minneapolis- CPED-Long Range Planning
105 5th Avenue South, Suite 200
Minneapolis, MN 55415
Phone:(612) 673-2670
brian.schaffer@minneapolismn.gov

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

STATE HISTORIC PRESERVATION OFFICE

June 8, 2015

Greg Mathis
MnDOT Cultural Resources Unit
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

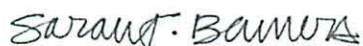
Thank you for continuing consultation on the above project. Information received in our office on 6 May 2015 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, 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 additional transit project information including your correspondence dated May 4, 2015 and the archaeological survey report completed by 10,000 Lakes Archaeology and Achaeo-Physics entitled *Archaeological Investigations for the Southwest Light Rail Transit Project: Areas A and B, and the Holden-Royalston Parcel* (Report) dated 2/15/2015.

We concur with your agency's determination that Areas A and B are not eligible for listing in the National Register of Historic Places (NRHP). We agree with the recommendation that a Phase II evaluation for archaeological site 21HE0432 is warranted. We look forward to reviewing the results of this evaluation when it is complete.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

14 July 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services, Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Cedar-Isles-Dean Neighborhood Association (CIDNA) Comments on 17 June 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the June 17, 2015 consultant meeting for the Southwest Light Rail Transit Project and to review the Section 106 materials provided at that meeting. The Cedar-Isles-Dean Neighborhood Association (CIDNA) has the following comments on the materials:

SWLRT Historic Properties Noise and Vibration Assessment:

- 1) *Grand Rounds Historic District (GRHD) (eligible) HE-PRK-001*: CIDNA is concerned that noise and vibration impacting the Grand Rounds Historic District has not been considered for the district as a whole. As has been repeatedly stated, an adverse effect on an historic resource in the Grand Rounds Historic District is considered an adverse effect that impacts the entire district. Individual components of the Grand Rounds Historic District, including Lake Calhoun (*HE-MPC-1811*), the Kenilworth Lagoon (*HE-MPC-1822*), Cedar Lake (*HE-MPC-1820*) Lake of the Isles (*HE-MPC-1824*), and Kenwood Park (*HE-MPC-1797*), have an FTA Noise Category of at least 3. Therefore, it stands to reason that the Grand Rounds Historic District should have a Noise Category of at least 3, as the impacts on individual components of the district impact the entire district.
- 2) CIDNA understands that the Noise and Vibration Assessment pertains to train operation and that a separate Noise and Vibration Assessment for construction is in process. CIDNA looks forward to the opportunity to review the Noise and Vibration Assessment for SWLRT construction and the proposed measures for protecting historic resources from construction-related impacts. CIDNA believes that it is imperative that these assessments be completed before construction begins.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review.

Best regards

Craig Westgate
Cedar-Isles-Dean Neighborhood Association

CC: Sarah Beimers, Minnesota State Historic Preservation Office, sarah.beimers@mnhs.org

20 August 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services, Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Cedar-Isles-Dean Neighborhood Association (CIDNA)
Comments on 29 July 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project
SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the July 29, 2015 consultant meeting for the Southwest Light Rail Transit Project and to review the Section 106 materials provided at that meeting. The Cedar-Isles-Dean Neighborhood Association (CIDNA) appreciates the efforts made to design a crossing for the Kenilworth Channel and Lagoon that minimizes the impact of the crossing on the historic channel—including fewer piers in the water and a desire to let light into the channel. However, CIDNA feels that there are still too many unknowns to sign off on any one bridge configuration. Based on situations that have arisen with new residential construction in the area, specifically additional foundation support due to inadequate soil, CIDNA is particularly concerned about the ability of the soil to support any of the proposed bridge structures as shown in the renderings at this time. In an effort to ensure that the adverse effect on the Kenilworth Channel and Lagoon is not greater than anticipated, CIDNA would like to request evidence that the proposed foundation type is adequate for the new loading conditions and existing soils, and that the installation and construction process for the foundation system will not have an impact on historic resources.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review.

Best regards,

Craig Westgate
Cedar-Isles-Dean Neighborhood Association



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparks.org

August 21, 2015

Mr. Greg Mathis
Office of Environmental Services, Cultural Resources Unit
Minnesota Department of Transportation
Mail Stop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155-1899

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota;
design of new crossing over Kenilworth Lagoon, SHPO #2009-0080

Dear Mr. Mathis:

The Minneapolis Park & Recreation Board (MPRB) appreciates the continued opportunity to comment on the design of the proposed Southwest Light Rail Transit (SWLRT) project bridges over the Kenilworth Channel. The channel is an important recreation resource within the Minneapolis Chain of Lakes Regional Park and it carries historic significance as a connection created as part of the development of the park. The Kenilworth Channel is under the jurisdiction of the MPRB and the proposed bridges are a central component of a Memorandum of Understanding between the Metropolitan Council and the MPRB (approved the MPRB Board of Commissioners on March 4, 2015). This letter addresses the MPRB's comments based on a request from the MnDOT Cultural Resources Unit dated July 21, 2015.

Staff of MPRB has been directly involved in the development of bridge concepts. The narrowing of concepts for the bridge by eliminating designs that employed a skewed alignment and an overlook as a part of the bridge deck proceeded without objection from the MPRB. However, staff at the Southwest Project Office (SPO) prepared additional concepts for review that included options for two bridges; the MPRB has stated previously and remains firm in its belief that a three bridge option is the less impactful crossing alternative because of the ability to separate expanses of bridge deck to allow light to penetrate to the channel itself.

The information provided to the MPRB indicates a preference of the State Historic Preservation Office for a thinner bridge deck at the freight rail that results in a five span configuration supported by four piers, two of which extend into the channel. The MPRB understands the desire to minimize the visual impact of the freight rail bridge by reducing the thickness of the bridge, but that visual impact is not recognized as a channel user passes under the

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bridge. In fact, the visual impact for a channel user passing under the bridge is based on the mass of piers, not the mass of the bridge deck. The MPRB has stated previously and remains firm in its belief that a bridge design that reduces bridge components IN THE CHANNEL should be pursued wherever practicable.

A trail bridge that spans the channel without piers, as noted in the letter of July 21, 2015 and the supporting information, achieves the MPRB's goals of reduced impacts on the channel itself. The MPRB strongly supports a trail bridge that does not require piers.

The LRT bridges described in the letter of July 21, 2015 and the supporting information include two alternatives: one a thinner deck and multiple pier design and the other a single span with no piers. The MPRB continues to believe that a solution that reduces the number of piers in the water is less impactful on the channel as a recreation and historic resource, therefore the MPRB supports the single span LRT bridge. However, the solution must also consider the ways in which the three bridges interact and the MPRB suggests that:

- If a trail bridge is pursued that utilizes a steel structure, it establishes itself as a unique element of the Kenilworth Channel experience and might best stand alone as a designed element. In this case, the LRT bridge might be best designed to complement the freight bridge and might have piers in the channel. However, if this direction is pursued, the MPRB desires the piers to have the smallest possible cross-section and least visual presence practicable, and that the piers match as closely as practicable the materials of the bridge deck and the piers used to support the freight rail bridge. As stated above, the thinness of the deck, particularly for the LRT bridge, is of lesser consequence because the bridge is most directly experienced from below. Its visual quality is not a primary concern of the MPRB because, from a view at nearly any distance, it is largely screened by the trail bridge and the freight bridge.
- If a trail bridge is pursued that utilizes a concrete structure, it might establish itself more directly with the adjacent concrete LRT bridge. In this case, the MPRB desires the LRT bridge to be designed as a single span with no piers.

The July 21, 2015 letter and supporting information reference the need to determine walls along the banks of the channel. Several alternatives have been considered but the MPRB suggests that a logical conclusion can be reached for a stone wall that would have extended continuously under the existing bridge on the south bank of the channel. While the letter describes conditions of that bank with missing stones, the MPRB believes that stone matching the existing stone can be obtained, that the obtained stone will be substantially the same age as any existing stone along the banks of the channel, and that the methods of constructing a contemporary stone wall can be substantially the same as methods employed to construct the extant stone wall. To believe that any other type of wall existed in the gap on the south bank is not logical, and to believe that this gap of stone wall was created when the current bridge was constructed is wholly plausible. For continuity of the experience of trail users, the MPRB urges the use of a stone wall along the south bank that substantially matches the extant stone wall.

On the north bank, no evidence has been provided that a stone wall existed under the location of the proposed bridges. While there may or may not have been a stone in this location, the MPRB believes it is entirely reasonable to construct a more ecologically-appropriate channel edge using coir logs (or a

similar material) at the bank with the riprap of the slope under the bridge extending the land side of the coir logs.

The slope under the bridge has been demonstrated with various types of stone. The MPRB has no strong preference for a material at this time, but notes that park users might easily displace the stones. In addition, the MPRB encourages the use of plantings at the edges of a stone slope that might someday find paths of growth past the "shadow" of the bridge above. In essence, the MPRB prefers a slope that is as informal as possible. As the MPRB is suggesting the continuation of the extant stone wall on the south bank of the channel, it seems possible that the slope at the north bank could be constructed using very similar material (as opposed to using another introduced material) since the stone is used in a very different way than in the extant stone walls.

Attachment C to the Memorandum of Understanding between the MPRB and the Metropolitan Council notes:

The MPRB undertook a study of the channel crossing and determined visual quality and noise as the MPRB's highest priorities for consideration in the design of the bridge.

As a result, the MPRB believes the design the bridges at the Kenilworth Channel must equally address visual quality and noise. In fact, directions for noise mitigation may run contrary to the idea of a thin deck as a "wall" may extend as much as two feet above the elevation of the LRT rails and result in the appearance of a more substantial bridge deck. To remain faithful to the terms of the Memorandum of Understanding, the design of the bridges proposed by the Metropolitan Council and the SPO MUST mitigate, to the degree practicable, noise generated by light rail vehicles. Because the mass of the bridge (above the piers) will result from the combination of the bridge deck AND the noise mitigation (and not from the bridge deck alone), the MPRB believes the more important visual quality factors relate to piers and their impact on the channel.

While much attention is being directed to the design of the bridge, the MRPB has stated and continues to believe the channel is the primary resource. The design of bridges, particularly as they impact upon the water in the channel, best derive from the ways in which they respect the channel as the primary resource.

Thank you for the opportunity to offer these comments. Please let me know if you have any questions.

Sincerely,



Michael Schroeder, Assistant Superintendent for Planning
Minneapolis Park & Recreation Board

STATE HISTORIC PRESERVATION OFFICE

August 21, 2015

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

RE: Southwest Light Rail Transit Project (Project)
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

We are continuing consultation on the above project which is being 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 correspondence and review materials submitted by your office on July 21, 2015 which, along with the informative consultation meeting on July 29th, provided a comprehensive summary of the consultation and design work completed thus far in an effort to minimize adverse effects caused by the Project's proposed construction of new crossing structures over the Kenilworth Lagoon, a contributing element in the NRHP-eligible Grand Rounds Historic District.

We appreciate the fact that the Project has continued to consider and incorporate measures to minimize the adverse effect through sensitive design and by eliminating previously reviewed design elements which included a proposed overlook platform on and a skewed alignment for the pedestrian/bicycle trail bridge. We also have taken into consideration your agency's justification for elimination of the two-bridge option and agree with the determination that, while the two-bridge option did provide a narrower corridor width of combined new crossing structures, this option had the potential to have a more pronounced negative effect on the integrity and use of the historic property especially at the park's waterway level. Thus, the refinement of the proposed new crossing design to a combination three-bridge option is an appropriate minimization effort.

In regards to the two (2) different three-bridge options presented – both of which include a thin deck, five-span freight rail bridge –we do not have an overwhelming preference of one over the other in regards to minimizing adverse impacts to the historic property. While the clear span arch option for the LRT bridge does allow for more openness at the waterway level, it also introduces much heavier deck and abutment features at each end. The three-span thinner deck LRT bridge, while introducing additional piers in the water, is compatible with the adjacent thin deck of the freight rail bridge and therefore offers uniformity of spans and the structure is lighter at the abutments.

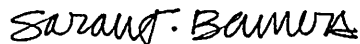
Regarding the clear span pedestrian/bicycle bridge, our preference tilts slightly towards the concrete bridge over the steel structure primarily for the additional material uniformity it provides with the other two crossing structures. We would still be willing to consider the steel crossing structure option, especially taking into consideration options for material types, colors, and other design details.

For whichever of the two three-bridge options that your agency chooses to move forward with, we will continue to consult regarding crossing structure design details - such as lighting and railings - as well as those pertaining to the crossing site, including vegetation, landscape grading, and bank treatments.

Regarding the potential impacts that construction of the new crossing structures will have on the WPA wing walls, we agree that the proposed measures outlined in your July 21st letter are appropriate. As indicated in the consultation meeting on July 29th, although your agency has not found pictorial or other documentation pertaining to this feature, we feel that it is safe to assume that the existing WPA wall on the south side of the channel most was most likely of continuous construction and that the missing section under the current freight and trail bridges was demolished or removed at some time in the past. Therefore, it is appropriate per the Standards to reconstruct a continuous wall in this section matching the WPA wall in design and materials. For the north side of the channel, we may assume that the WPA wall may have never been constructed here as it appears to end just east of the existing crossing and there are no other remnants to the west. In this case, to meet Standards it is appropriate to design the required new channel bank wall to be differentiated from and compatible with the massing, size, scale and architectural features of the adjacent WPA wall.

We look forward to continuing consultation on this aspect of the project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

25 August 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on 29 July 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the July 29, 2015 consultant meeting and to review the revised materials provided at that meeting. The Kenwood Isles Area Association (KIAA) has the following comments on the materials:

- 1) KIAA believes that in addition to the historicity of the Kenilworth Lagoon, part of its defining character is its natural quality. We urge designs and materials that are consistent with this character.
- 2) KIAA's view is that the combination design #1 with the three-bridge layout best reflects the area's historic, built and natural environment. However, we concur with CIDNA in requesting evidence that the installation and construction process for the foundation system will not have an impact on historic resources.
- 3) We were informed at the July 29th meeting that low walls with dampers are being studied to address the auditory impacts of LRT trains on the bridge. We appreciate this consideration. The auditory impacts of the freight trains were mentioned but not discussed. The new freight bridge and the trains that will cross it are a critical element of the SWLRT project; a temporary situation will be replaced with new, permanent infrastructure. We therefore urge designers to be vigilant about the setting and feeling of the historic channel, including minimizing visual and audible intrusions and sounds associated with modern rail infrastructure, including freight rail, that may alter the park-like setting of the lagoon, a vital element of its historic character.
- 4) KIAA does not have an opinion on the treatment of the WPA walls at this time.
- 5) Construction of three bridges will require removal of large trees and dense greenery on the Lagoon banks. This will substantially reduce the visual quality of the Lagoon and significantly impact its character and feeling as well as the experience of passing through the waterway. We would value a consideration of this issue at a future point in our discussions of bridge design.

Thank you for continuing to work to answer KIAA's questions regarding area impacts and for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

Jeanette Colby
Kenwood Isles Area Association

cc: Kenwood Isles Area Association
Cedar Isles Dean Neighborhood Association
Michael Schroeder, Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Ludt, Preservation Design Works

Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

August 25, 2015

RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota; Comments from July 21, 2015 consultation on potential effects. (SHPO#2009-0080)

Dear Mr. Mathis,

Thank you for providing the materials included in your July 21, 2015 transmittal submittal and facilitating the consultation meetings on July 29, 2015, which we unfortunately could not attend. The focus of this round of consultation was the Kenilworth Channel Crossing. 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.

Two versus Three Bridge Configuration

CPED-Long Range Planning has reviewed the materials provided on July 21, 2015. We agree with your assessment in the July 21, 2015 transmittal letter that the two bridge configuration "...results in a more pronounced adverse effect on the feeling of the historic property at the waterway level... ." Given the materials and analysis provided for this consultation, CPED-Long Range Planning believes that the three bridge configuration minimizes the adverse effect compared to the two bridge configuration.

Bridge Piers

CPED-Long Range Planning supports the four pier bridge concept for the freight rail bridge and the zero pier concept for the trail bridge. The materials provided were very useful in understanding the dimensional differences between the bridge concepts and the renderings were useful in visualizing the no-pier vs two pier LRT bridge concepts; however, it is very difficult to determine the which design further minimizes the negative effects- one that provides a larger bridge deck and lower bridge structure versus a thinner deck and higher clearance.

CPED-Long Range Planning looks forward to continued consultation. Thank you for the opportunity to comment.

Sincerely,



Brian Schaffer
Principal City Planner, AICP
City of Minneapolis- CPED-Long Range Planning
105 5th Avenue South, Suite 200
Minneapolis, MN 55415
Phone: (612) 673-2670
brian.schaffer@minneapolismn.gov

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

18 October 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on 23 September 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the September 23, 2015 consultant meeting, and thanks especially for your efforts to complete a traffic study related to the impacts of the proposed Southwest LRT on historic properties in the Kenwood and Cedar-Isles-Dean neighborhoods in Minneapolis. This study was distributed to Section 106 Consulting Parties in the form of a memorandum to Jim Alexander, Director of Design and Engineering, from Ted Axt, PE, Deputy Project Manager, ADC, and dated September 15, 2015.

While the Kenwood Isles Area Association (KIAA) very much appreciates that the traffic study was conducted, we have concerns about the credibility of its findings. Identified below, the study's problems may or may not have bearing on the project's impact on historic properties, but we would be remiss to let them pass without comment.

- 1) The south side of 21st Street near the proposed station area is not currently a "Critical Parking Area" requiring a residential permit (see page 3, paragraph 4). There is no existing reason this road and most other nearby residential roads would not be used for commuter parking if an LRT station is built at 21st Street.
- 2) The study describes existing bus service, but does not consider potential future bus connections to the proposed LRT stop at 21st Street (see page 3, paragraph 5). A significant increase in bus traffic may impact Kenwood Park and Kenwood Parkway.
- 3) The study predicts 1,001 daily boardings/alightings at the proposed 21st Street Station for the 2040 horizon year (see Table 2, page 4). On the same day we received this study, a representative of the Southwest Project Office told a former KIAA Board member that the 21st Street daily ridership is projected to be 1,662. This difference of 60% contributes to community skepticism about the Metropolitan Council's Regional Travel Demand Model.
- 4) The study predicts that of the 1,001 riders at 21st Street, 947 people (95%) would walk to and from the station in this area of mostly single-family homes. This figure contrasts surprisingly with the proposed West Lake Station – surrounded by dense housing, office and retail activities – where 900 people are projected to access the station by walking (see Table 5, page 6).

- 5) While KIAA appreciates that no park-and-ride lot is planned for the proposed 21st Street station, experience at existing light rail stations in the Twin Cities shows that commuters park and ride using city streets. The study does not consider this potential traffic and parking impact (see Table 2, page 4).

Thank you for continuing to work to answer KIAA's questions regarding area impacts and for the opportunity to review these materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

Jeanette Colby
Kenwood Isles Area Association

cc: Cedar Isles Dean Neighborhood Association
Michael Schroeder, Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Ludt, Preservation Design Works



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparcs.org

VIA EMAIL TO: greg.mathis@state.mn.us

October 19, 2015

Mr. Greg Mathis
Office of Environmental Services, Cultural Resources Unit
Minnesota Department of Transportation
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155-1899

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; consultation on project effects, SHPO #2009-0080

Dear Mr. Mathis:

As previously stated, the Minneapolis Park & Recreation Board (MPRB) appreciates the opportunity for continued comment on the proposed Southwest Light Rail Transit (SWLRT) project and its potential for impacting lands and resources under the jurisdiction of the MPRB.

MPRB staff reviewed a memorandum regarding *Traffic Changes from Southwest Light Rail Transit Operations at Historic Properties within the 21st Street Station and West Lake Station Areas of Potential Effects* (to Jim Alexander, Director of Design and Engineering, Southwest LRT Project from Ted Axt, PE, Deputy Project Manager, ADC, dated September 15, 2015).

Based on the memorandum, it appears the traffic projections related to the SWLRT project result in minor increases in traffic in the area of the 21st Street station (30 additional trips when compared to the 2040 No Build Alternative). Using this information, the MPRB concurs there is no substantive impact on historic properties under the jurisdiction of the MPRB in the area of the 21st Street Station.

The MPRB notes that the introduction of a regional transit facility into the Kenilworth Corridor with a station at 21st Street poses the potential for greater accessibility to parks in the corridor and, in particular, East Cedar Beach. While it is not clear from the memorandum if the proximate location of parks and park facilities affects ridership predicted at the 21st Street Station, but the MPRB is supportive of transit infrastructure that affords users greater access to regional parks.

A review of the impacts of the West Lake Station reveals there is no difference in projected traffic volume when the 2040 No Build and 2040 Build Alternatives are compared. Using this information, the MPRB concurs there is no substantive impact on historic properties under the jurisdiction of the MPRB in the area of the West Lake Station from traffic.

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As noted for the 21st Street Station, it is expected the introduction of the West Lake Station will generate ridership focused on the Minneapolis Chain of Lakes Regional Park. For reasons suggested for the 21st Street Station, the MPRB is supportive of the role of the West Lake Station in bringing park users to an already significant regional park destination. However, the MPRB is concerned that “hide and ride” users may choose to utilize MPRB parking facilities for LRT trips. Where the memorandum notes that indirect access to the station from MPRB parking facilities will limit the use of those parking facilities, a separate study in which the Southwest Project Office is participating promotes enhanced access between the West Lake Station and Lake Calhoun—which could equally promote the use of the Grand Rounds for parking by LRT users. In addition, where the memorandum notes that available parking for the Grand Rounds is already heavily used and therefore would not be generally available for LRT users, those parking spaces are currently not heavily used during the LRT’s AM peak hours. And finally, a suggestion that the ¼ mile distance from the station might limit parking on the Grand Rounds seems to conflict with an earlier statement in the memorandum suggesting that walking access to the 21st Street Station would generally occur within one mile of the station; it would seem that walking access to the stations might be very much the same for both stations. The MPRB requests a more detailed explanation of the impacts of “hide and ride” parking on the Grand Rounds based on our review of the conditions noted above.

At its September 23, 2015 meeting, the MPRB Board of Commissioners approved the concept design for the bridges crossing the Kenilworth Channel. The approval noted staff’s concurrence with the recommendations of the State Historic Preservation Office related to the proposed design and its belief that the proposed design for the bridges poses the least impact on the historic resources of the Kenilworth Channel and establish a design fitting the character and context of the channel and the Minneapolis Chain of Lakes Regional Park. Part of the approval indicated the need for continued participation of the MPRB in the further design of features and details such as railings, trail portal elements, under-bridge slopes, WPA and other walls at the channel, and other design refinements.

Thank you for the opportunity to offer comments on these issues. Please let me know if you have any questions.

Sincerely,



Michael Schroeder, Assistant Superintendent for Planning
Minneapolis Park and Recreation Board

STATE HISTORIC PRESERVATION OFFICE

October 26, 2015

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

RE: Southwest Light Rail Transit Project (Project)
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

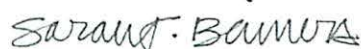
Thank you for continuing consultation on the above project. Information received on 21 September 2015 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, 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 correspondence and review materials submitted by your office on September 18, 2015 which included an update on project design development as well as the summary results of the traffic study completed for the proposed 21st Street Station and West Lake Station as they pertain to consideration of potential effects to historic properties. Unfortunately we were unable to attend the Section 106 consultation meeting on September 23rd and apologize for not providing notification of our absence prior to the meeting.

We generally agree with your agency's determination that the results of the traffic study indicate that there is no need to adjust the current Section 106 area of potential effect (APE) for the Project and that the anticipated minor increase in street traffic associated with the construction of these two (2) LRT stations will not adversely affect historic properties. It is our understanding that other consulting parties, both the Minneapolis Park & Recreation Board and the Kenwood Isles Area Association, continue to have concerns regarding increases in what the study calls "hide and ride" LRT users, resulting in increases in on-street parking in adjacent neighborhoods thereby potentially limiting parking access to residents, park users, and nearby businesses. We recommend continuing consultation with our office and the other consulting parties regarding the best ways to approach consideration of the possibility of increased parking demands in the vicinity of these two stations and the potential effect this might have on historic properties.

We look forward to continuing consultation as we anticipate the Federal Transit Authority's final effect determinations and development of a Memorandum of Agreement for the Project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

STATE HISTORIC PRESERVATION OFFICE

November 5, 2015

Greg Mathis
MnDOT Cultural Resources Unit
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

Thank you for continuing consultation on the above project. Information received in our office on 8 October 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, 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 additional project information provided in your correspondence letter dated October 7, 2015 which included the following documents:

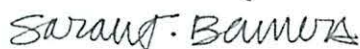
- *Phase II Archaeological Evaluation of Site 21HE0452 for the Southwest Light Rail Transit Project, Minneapolis, Minnesota* (10,000 Lakes Archaeology Inc, July 2015);
- *Phase I Architecture/History Investigation: Southwest LRT Project, Hennepin County, Minnesota, Volume Seven Supplemental Report Number Four (FEIS)* (106 Group Ltd, July 2015) and Minnesota Architecture/History Inventory Forms for 122 properties;
- Southwest LRT Final EIS, APE Revision Maps for Architecture/History and Archaeology.

We agree with your agency's determination that the APE revisions, as presented in the map documents provided with this submittal, are generally appropriate to take into account the potential direct and indirect effects of the proposed undertaking as we currently understand it. We look forward to reviewing the results of the additional archaeological survey for the "Glenwood Parcel" in Minneapolis and the architecture/history investigations for these new APE areas.

Based upon our review of the survey reports listed above, we concur with your agency's determination that archaeological site 21HE0452 is not eligible for listing in the National Register of Historic Places (NRHP) and that no additional architecture/history properties eligible for listing in the NRHP were identified. Therefore, we concur that no additional historic properties have been identified through the recent supplemental survey and property evaluation for this project.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

STATE HISTORIC PRESERVATION OFFICE

December 14, 2015

Greg Mathis
MnDOT Cultural Resources Unit
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

Thank you for continuing consultation on the above project. Information received in our office on 18 November 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, 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 additional project information provided in your correspondence letter dated 18 November 2015, a submittal which also included the following survey reports:

- *Phase I Archaeological Investigations of the Glenwood-Royalston Parcel for the Southwest Light Rail Transit Project, Minneapolis, Minnesota* (10,000 Lakes Archaeology Inc, 9 November 2015);
- *Phase I Architecture/History Investigation Southwest LRT Project, Hennepin County, Minnesota: Volume Eight Supplemental Report Number Five (FEIS)* (106 Group, November 2015)

We concur with your agency's determination that, through these recent supplemental surveys, no additional historic properties have been identified within the project's current APE.

We look forward to continuing consultation on this important project. 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.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

17 December 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Cedar-Isles-Dean Neighborhood Association (CIDNA) Comments on November 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #[2009-0080](#)

Dear Mr. Mathis:

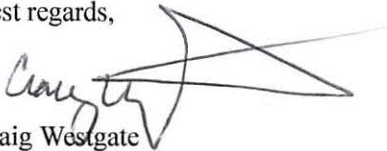
Thank you for the opportunity to participate in the December 3, 2015 consultant meeting for the Southwest Light Rail Transit Project and to review the Section 106 materials provided at that meeting.

CIDNA shares the concerns voiced by the Minneapolis Park and Recreation Board regarding the proposed reconstruction of WPA retaining walls as mitigation for the adverse effect of the new Kenilworth Crossing. In addition to the MPRB's concerns about its ability to maintain a stone retaining wall and the negative ecological impact of such a wall, CIDNA does not feel that the reconstruction of a long-absent retaining wall is appropriate mitigation for the magnitude of the adverse effects caused by the new crossing.

Mitigation at the level of the channel banks would not off-set that dramatic changes to view corridors and the impact of additional bridge deck and structure on the channel and the Grand Rounds. In other words, the scale of the proposed mitigation is not in line with the scale of the adverse effects.

Again, thank you for the opportunity to review these materials and to participate in future consultation for the Section 106 review.

Best regards,



Craig Westgate
Cedar-Isles-Dean Neighborhood Association

17 December 2015

Greg Mathis
Minnesota Department of Transportation
Office of Environmental Services
Cultural Resources Unit
Mailstop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155
greg.mathis@state.mn.us

RE: Kenwood Isles Area Association (KIAA) Comments on December 3, 2015 Consultation on Potential Effects of Southwest Light Rail Transit Project, SHPO #2009-0080

Dear Mr. Mathis:

Thank you for the opportunity to participate in the December 3, 2015 consultant meeting. We would like to offer the following comments:

- 1) With regard to the WPA walls in the Kenilworth Channel, we very much appreciate the thought given to restoring the historic walls. However, a great deal of green space will be removed adjacent to the historic Channel to make way for the light rail bridge and the new permanent freight rail bridge, both of which are part of the SWLRT project. This green space is critical to the setting and feeling of the Channel. We therefore hope that you could further explore the MPRB's suggestion that there are greener, more environmentally appropriate ways to address the Channel's banks – applying knowledge that was unavailable at the time of the WPA. KIAA also hopes that whatever the solution, the assurance of aesthetic value, safety, and adequate maintenance will be considered.
- 2) The Kenwood Isles Area Association continues to be perplexed by the Southwest Project Office's position that the "freight rail is an existing condition" in the Kenilworth Corridor. The SWLRT project plans to provide millions of dollars to move, improve and expand freight infrastructure, making a temporary situation permanent. Permanent freight rail will significantly impact the Kenilworth Channel and the Grand Rounds at Cedar Lake Parkway. The environmental impacts of the SWLRT project, including impacts on historic properties, have not been fully understood and likely will not be adequately mitigated because of the SPO's flawed and incomplete approach.

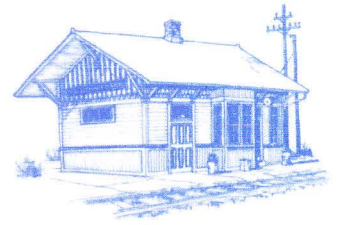
Again, thank you for continuing to answer KIAA's questions regarding area impacts and for the opportunity to review materials and to participate in future consultation for the Section 106 review of the Southwest Light Rail Transit Project.

Sincerely,

Jeanette Colby
Kenwood Isles Area Association

cc: Craig Westgate, Cedar Isles Dean Neighborhood Association
Michael Schroeder, Minneapolis Park and Recreation Board
Sarah Beimers, Minnesota State Historic Preservation Office
Tamara Ludt, Preservation Design Works

ST. LOUIS PARK HISTORICAL SOCIETY



3700 Monterey Drive, St. Louis Park, MN 55416-2671 e-mail: history@slphistory.org

12/17/2015

The St. Louis Park Historical Society approves of the Southwest LRT plan for the noise wall by the Chicago, Milwaukee, St. Paul & Pacific (The Milwaukee Road) Depot. The revised location on the 12/1/2015 plan doesn't block the view of the transportation right of way from the Depots present location in Jorvig Park.

Sincerely,

The St. Louis Park Historical Society

Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

December 18, 2015


RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota; Comments from November 10, 2015 consultation on potential effects. (SHPO#2009-0080)

Dear Mr. Mathis,

Thank you for providing the materials included in your November 10, 2015 transmittal submittal and facilitating the consultation meetings on December 3, 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.

CPED agrees with the Findings of Effect in the materials. With regard to the Adverse Effects at sites 21HE0436 and 21HE0437, as we noted in the Consultation Meeting, CPED is concerned about the specificity of the measures of interpretation provided. The locations of physical interpretation elements need to be first considered on the platform and the LRT project's property and then the consideration of interpretative elements within the City street and sidewalk. The City's concerns include long term maintenance obligations and future infrastructure connections made within Royalston for the properties to the west, where redevelopment is likely. These future connections will result in modifications to the interpretive elements. We look forward to working through the details of the proposed interpretation.

Sincerely,



Brian Schaffer
Principal City Planner, AICP
City of Minneapolis- CPED-Long Range Planning
105 5th Avenue South, Suite 200
Minneapolis, MN 55415
Phone: (612) 673-2670
brian.schaffer@minneapolismn.gov

cc: Sarah Beimers, MN SHPO (via email)



DELIVERED VIA EMAIL TO: greg.mathis@state.mn.us

Minneapolis
Park & Recreation Board 18 December 2015

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400
Fax
612-230-6500

www.minneapolisparcs.org

Mr. Greg Mathis
Office of Environmental Services, Cultural Resources Unit
Minnesota Department of Transportation
Mail Stop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155-1899

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; design of new crossing over Kenilworth Lagoon, SHPO #2009-0080

Dear Mr. Mathis:

The Minneapolis Park & Recreation Board (MPRB) appreciates the opportunity to comment on impacts on historic resources related to the Southwest Light Rail Transit (SWLRT) project's proposed bridges over the Kenilworth Channel. The MPRB recognizes the channel as an important recreation resource within the Minneapolis Chain of Lakes Regional Park as well as its historic significance as a connection created as part of the development of the park. The Kenilworth Channel is under the jurisdiction of the MPRB. The proposed bridges are a central component of a Memorandum of Understanding (MOU) between the Metropolitan Council and the MPRB (approved the MPRB Board of Commissioners on March 4, 2015).

The MOU, and in particular Attachment C, outlines considerations for a design of the Kenilworth bridges that meet the goals and needs of the MPRB. The MPRB believes the concept design for the bridges reasonably addresses impacts on park users if the SWLRT project is implemented. As a result, the MPRB Board of Commissioners approved the concept design for the Kenilworth Bridges as proposed by the Southwest Project Office (SPO). In approving the concept, commissioners understood the impacts of the bridge crossings on the resource and were supportive of a design that attempted to mitigate the impacts of the crossing through the design of the bridges. In particular, the MPRB understand the proposed design of the bridges:

- Separates the bridges into three structures, each designed to specific requirements based on loading and deflection, allowing more light to penetrate to the channel than configurations using two bridges;
- Provides clear span configurations for bridges carrying the LRT and trail, eliminating bridge structure penetrations to the channel and creating a more expansive viewshed along the channel;

President
Liz Wielinski

Vice President
Scott Vreeland

Commissioners

Brad Bourn
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Meg Forney

Steffanie Musich

Jon C. Olson
Anita Tabb
M. Annie Young

Superintendent
Jayne Miller

Secretary to the Board
Jennifer B. Ringold



- Creates a design that relates key forms and materials for the LRT and trail bridges with a complementary aesthetic for the freight rail bridge, establishing a sense of coherency that keeps the setting of the channel prominent;
- Reflects key guidance for the design of bridges established by the Park Board during the creation of the channel with structures that reflect contemporary structural design, perpetuating the significance and authenticity of bridges designed and constructed when the park was first developed; and
- Reduces noise generated by light rail vehicles through the use of noise dampening in the rail design and low walls incorporated in the design of the LRT bridge, helping to maintain the serene nature of the channel and adjacent parklands.

In approving the concept design, the MPRB recognizes that features integral to the design of the bridges address many of the impacts posed by the bridges and the SWLRT project's crossing of the channel.

The MPRB understands that mitigation proposed for the adverse impacts on the Kenilworth Channel includes restoration and reestablishment of Works Progress Administration stone walls at the banks of portions of the channel. Those walls are evident in some areas of the channel and the mitigation proposed would include restoration where necessary. The MPRB is supportive of restoration of those walls, especially where they are impacted directly by the construction of the proposed Kenilworth bridges.

In other areas, the potential for the presence of walls was investigated beyond an in-field survey conducted during the late summer. The SPO has expressed confidence that walls existed along the northerly bank of the channel between the proposed Kenilworth bridges and the Burnham Road Bridge, although these walls are deteriorated and not evident as a designed edge to the channel. While the MPRB understands that historic features may exist in deteriorated conditions in portions of the Kenilworth Channel, reestablishment of those walls would be opposed for the following reasons:

- Expansion of the limits of disturbance to accomplish mitigation has not demonstrated the possibility for further degradation of other features integral to the experience of the Kenilworth Channel. In particular, introduction of a co-location solution for LRT and freight rail in the Kenilworth Corridor subjects the corridor to significant loss of vegetation. The MPRB would not support further vegetation losses to construct a wall matching the WPA-era walls as mitigation for impacts from the SWLRT's crossing of the Kenilworth Channel.
- While the SPO asserts that walls existed in that portion of the channel between the proposed Kenilworth bridges and the Burnham Road Bridge, the MPRB has not had resources sufficient to maintain them. Reestablishing these walls would likely be subject to deterioration upon reestablishment because there is no source of funds to maintain them. It is likely that with time any walls

reestablished as mitigation for impacts on the Kenilworth Channel would deteriorate as a result of lack of maintenance, eventually becoming very much like what exists today along that length of the channel. Because of needs to support parks and recreation programming throughout Minneapolis' parks, it is unlikely that necessary funds could be directed to the maintenance of any reestablished walls in this location.

- The MPRB's current practices for shoreline management are focused on creation and perpetuation of more ecologically appropriate methods. The armoring of shorelines and stream banks, while present in many areas of the Grand Rounds, is not a practice that is encouraged by our comprehensive plan or water quality management practices. The MPRB recognizes that WPA-era stone walls in some areas must be perpetuated, with the focus being areas where the historic resource contributes significantly to the recreation experience or where such an armored edge offers protection from degradation of the shoreline that might result from recreation use. In the area of the channel between the proposed Kenilworth bridges and the Burnham Road Bridge, the "missing" walls do not detract from the recreation experience and the banks of the channel are not subject to use that would result in further degradation of the bank. In these areas, the MPRB proposes a more ecologically appropriate edge to the channel would be more reasonable and sustainable solution.

In essence, the MPRB does not view reestablishing long-deteriorated walls as reasonable mitigation for the impacts of the proposed bridges over the channel. However, this instance points to the need for the MPRB to establish guidance that perpetuates key historic resources and character in the Grand Rounds while accommodating contemporary park use and trends. Unfortunately, the resources to create that guidance do not currently exist within the MPRB.

The MPRB appreciates the attention the SPO is directing to the Kenilworth Channel and the design of the bridges. We remain interested in continuing discussions that lead to the best possible experience for park users.

Sincerely,



Michael Schroeder, Assistant Superintendent for Planning
Minneapolis Park & Recreation Board

STATE HISTORIC PRESERVATION OFFICE

March 3, 2016

Greg Mathis
MnDOT Cultural Resources Unit
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155-1899

RE: Southwest Light Rail Transit Project
Multiple Communities, Hennepin County
SHPO Number: 2009-0080

Dear Mr. Mathis:

Thank you for continuing consultation on the above project. Information received in our office on 5 February 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 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 most recent Draft Memorandum of Agreement (MOA) for this project, and also participated in the latest consultation meeting held on February 25, 2016. We are providing our comments directly in the Draft MOA, please see the attachment provided in our email of March 3, 2016.

We look forward to continuing consultation on this important project. If you have any questions or concerns regarding our comments on the Draft MOA, please feel free to contact me at 651-259-3456 or sarah.beimers@mnhs.org.

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance

From: [Lori Creamer](#)
To: [Mathis, Gregory \(DOT\)](#)
Cc: [Julie Klima](#); [Janet Jeremiah](#)
Subject: LRT 106 Review comments for the DRAFT MOA
Date: Monday, March 07, 2016 4:09:27 PM

Hi Greg,

Thanks for the opportunity to provide comments on the Draft MOA for the LRT 106 review.

Confirmation of signatures are below:

Rick Getschow, City Manager will be the concurring party for the City of Eden Prairie.

Steve Olson, Chair will be the concurring party for the Eden Prairie Heritage Preservation Commission.

As I mentioned at the meeting the City of Eden Prairie would like to be contacted along with the state and federal agencies if something is discovered during the land alteration portion of the project and if the MHPO determines the artifact(s) are something that should be kept at the state level, that is fine. If the MHPO determines it is NOT something they would like to keep in their collection, the City of Eden Prairie and/or Eden Prairie Historical Society would like the opportunity to save it for their collection(s).

I have added language to the portion of the draft MOA below with the changes in red.

Please contact me with questions/comments.

Thanks again,
Lori

XII. REVIEW PROCESS DURING CONSTRUCTION

This stipulation covers the discoveries of additional historic properties, PROJECT modifications, and changes of effect to known historic properties identified during PROJECT construction and not specifically addressed by other stipulations of this AGREEMENT.

- A. Prior to initiating PROJECT construction, as defined in Stipulation IV of this AGREEMENT, the COUNCIL shall prepare as part of the CPP required by Stipulations IV and IV.D of this AGREEMENT a plan for the unexpected discovery of historic properties.
- B. PROJECT Modifications. If, after the completion of 100% Plans, the COUNCIL makes modifications to the PROJECT design during construction, MnDOT CRU shall review the modifications to determine if there are any substantive changes in the PROJECT's design that that would result in new and/or additional adverse effects on historic properties or a revision in the PROJECT's APE. If there are substantive changes that would result in a new and/or additional adverse effect and/or requiring a revision to the PROJECT's APE, FTA shall consult with MnHPO and the concurring parties in accordance with Stipulations III of this AGREEMENT.

C. Historic Properties Discovered or Unexpectedly Affected as a Result of PROJECT Construction.

If previously unidentified historic properties, including human remains, are discovered unexpectedly during construction of the PROJECT, or previously known historic properties are affected, or have been affected in an unanticipated adverse manner, all ground-disturbing activities will cease in the area of the property, as well as within one hundred (100) feet of it, to avoid and/or minimize harm to the property. The contractor will immediately notify the COUNCIL of the discovery and implement interim measures to protect the discovery from damage, looting, and vandalism, including but not limited to protective fencing and covering of the discovery with appropriate materials. The COUNCIL will inform MnDOT CRU and the concurring party effected. If reasonably convenient and appropriate, the contractor, COUNCIL, and MnDOT CRU and concurring party will confer at the site in a timely manner to assess the property, determine the likely PROJECT impacts to the property, and to determine the most appropriate avoidance measures for the property. Any unexpected artifacts discovered during construction would be evaluated by the MNHS and if determined non-significant then the artifact could remain in the local historical society collections if desired.

Ix Non-Human Remains.

- A. The COUNCIL, with assistance from MnDOT CRU, will contract with a qualified archaeologist, historian and/or architectural historian, as appropriate, who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for their respective field to record, document, and provide a recommendation on the NRHP eligibility of the discovery to FTA within seventy-two (72) hours of receipt of notification. FTA will inform MnHPO, the concurring party, and any Indian tribes that may attach religious and cultural significance to the property, of the discovery.

Iix. Human Remains.

- B. Since there are no federal lands within the construction limits for the PROJECT, if any human remains are encountered, the PROJECT shall follow the treatment of human remains as per Minnesota Statute 307.08. The COUNCIL shall immediately notify local law enforcement and the Office of the State Archaeologist (OSA). The COUNCIL shall also immediately notify the FTA, MnHPO, MnDOT CRU, concurring parties and appropriate Tribes within twenty-four (24) hours via email, fax, or telephone. The OSA shall coordinate with the Minnesota Indian Affairs Council (MIAC) if the remains are thought to be Native American, in accordance with Minnesota Statute (M.S.) 307.08. OSA will have the final authority in determining if the remains are human. The COUNCIL, with assistance from MnDOT CRU, will also contract with a qualified archaeologist to provide a recommendation on the NRHP eligibility of the discovery, including the human remains, to FTA within seventy-two (72) hours of receipt of notification. FTA will inform MnHPO and any Indian tribes that may attach religious and cultural significance to the property, of the discovery.

C. If it is determined that the identified bones are human remains covered under M.S. 307.08, the OSA shall have jurisdiction to ensure that the appropriate procedures in accordance with Minnesota statutes are fulfilled. OSA is the lead state agency for authentication of burial sites on non-federal lands as per M.S. 307.08. The COUNCIL, with the assistance of MnDOT CRU, shall work with OSA, MnHPO, the Tribes, MIAC, and other parties to develop and implement a reburial plan, if that is the preferred approach by the parties. Avoidance and preservation in place is the preferred option for the treatment of human remains. If FTA also determines that the burial site is eligible for the NRHP, FTA and MnHPO shall work with OSA and MIAC on determining appropriate treatment and mitigation.

Lori Creamer

Planning Technician
Planning Division
City of Eden Prairie



8080 Mitchell Road | Eden Prairie, MN 55344-4485



952.949.8481 |  lcreamer@edenprairie.org |  edenprairie.org



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Greg Mathis
Minnesota Department of Transportation- Cultural Resources Unit
395 John Ireland Boulevard
St. Paul, MN 55155

RE: Southwest Light Rail Transit Project, Hennepin County; Minnesota; Comments on Draft Memorandum of Agreement. (SHPO#2009-0080)

Dear Mr. Mathis,

Thank you for providing the materials included in your February 4, 2016 transmittal. 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 has reviewed the draft memorandum of agreement and finds it sufficient. We agree with the process and steps identified for the Archaeological Sites 21HE0436 and 21HE0437.

For the signature page for the Concurring Party for the City of Minneapolis please include Kjersti Monson, Long Range Planning Director for CPED as signatory.

Thank you again for the opportunity comment.

Sincerely,



Brian Schaffer
Principal City Planner, AICP
City of Minneapolis- CPED-Long Range Planning
105 5th Avenue South, Suite 200
Minneapolis, MN 55415
Phone:(612) 673-2670
brian.schaffer@minneapolismn.gov

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



**Minneapolis
Park & Recreation Board**

Administrative Offices
2117 West River Road
Minneapolis, MN 55411-2227

Operations Center
3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone
612-230-6400

Fax
612-230-6500

www.minneapolisparcs.org

7 March 2016

Mr. Greg Mathis
Office of Environmental Services, Cultural Resources Unit
Minnesota Department of Transportation
Mail Stop 620
395 John Ireland Boulevard
St. Paul, Minnesota 55155-1899

RE: Southwest Light Rail Transit Project, Hennepin County, Minnesota; Draft Memorandum of Agreement, SHPO #2009-0080

Dear Mr. Mathis:

The Minneapolis Park & Recreation Board (MPRB) has reviewed the draft Memorandum of Agreement (MOA) as part of its Section 106 consulting party review. The MPRB is pleased to report that we have no substantive comments.

The MPRB understands the MOA does not relieve the Metropolitan Council from pursuing construction permits for its activities related to the Southwest Light Rail project on MPRB properties for the purposes of investigations or construction of improvements or otherwise relieve the Metropolitan Council of any of its obligations under the Memorandum of Understanding between the Metropolitan Council and the MPRB related to the crossing of the Kenilworth Channel.

I will be recommending to the Board of Commissioners that the MOA be approved. We look forward to collaborating with the Minnesota Historic Preservation Office to fulfill the terms of the MOA.

Thank you for the opportunity to offer these comments. Please let me know if you have any questions.

Sincerely,

Michael Schroeder, Assistant Superintendent for Planning
Minneapolis Park & Recreation Board

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Liz Wielinski

Vice President
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