



Appendix H

Section 106 Supporting Materials

The following is a list of supporting materials used in the Section 106 of the National Historic Preservation Act process.

H.1 Memorandum of Agreement

1. Federal Transit Administration (FTA) and Minnesota State Historic Preservation Office (MnHPO), *Section 106 Memorandum of Agreement between the Federal Transit Administration and the Minnesota State Historic Preservation Office*. Execution ready version, June 2016

H.2 Section 106 Agency Correspondence

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



17. Advisory Council on Historic Preservation letter declining participation in the proposed BLRT Extension project Section 106 process, March 15, 2016
18. MnDOT Cultural Resources Unit letter re-evaluating the boundaries for the Floyd B. Olson Memorial Statue to MnHPO, March 10, 2016
19. MnHPO letter concurring on re-evaluation of boundaries for the Floyd B. Olson Memorial Statue, March 28, 2016

H.3 Section 106 Consultation Meeting Notes

1. Proposed BLRT Extension project Section 106 Consultation meeting notes, June 5, 2015
2. Proposed BLRT Extension project Section 106 Consultation meeting notes, July 10, 2015
3. Proposed BLRT Extension project Section 106 Consultation meeting notes, July 16, 2015
4. Proposed BLRT Extension project Section 106 Consultation meeting notes, February 4, 2016
5. Proposed BLRT Extension project Section 106 Consultation meeting notes, March 10, 2016
6. Proposed BLRT Extension project Section 106 Consultation meeting notes, March 24, 2016

H.4 Other Supporting Documents

1. FTA, *METRO Blue Line Extension Light Rail Transit Project Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties (DOE Report)*, January 20, 2016.
2. The 106 Group Ltd, *Theodore Wirth Regional Park Cultural Landscape Study for the Blue Line Extension LRT Project*, September 2015.
3. The 106 Group Ltd, *Phase I and II Architectural History Survey for the Bottineau Transitway Project, Crystal, Brooklyn Park, Golden Valley, Maple Grove, Minneapolis, New Hope, and Robbinsdale, Hennepin County, Minnesota (Volume 1 and 2)*, 2012. Available at <http://metro council.org/Transportation/Projects/Current-Projects/METRO-Blue-Line-Extension/Environmental/Technical-Reports.aspx>.
4. The 106 Group Ltd, *Phase IA Archaeological Assessment for the Bottineau Transitway Project, Hennepin County, Minnesota*, 2012. This report is available by request.
5. The 106 Group Ltd, *Bottineau Transitway Phase I and II Architectural Survey, Hennepin County, Minnesota: Supplemental Report 1*, 2013. Available at <http://metro council.org/Transportation/Projects/Current-Projects/METRO-Blue-Line-Extension/Environmental/Technical-Reports.aspx>.
6. FTA and MnHPO, *Section 106 Programmatic Agreement Between the Federal Transit Administration and the Minnesota State Historic Preservation Office Regarding the Construction of the Interchange Project Minneapolis, Minnesota*, 2012.



Appendix H

Section 106 Supporting Materials

H.1 Memorandum of Agreement

1. Federal Transit Administration and Minnesota State Historic Preservation Office, *Section 106 Memorandum of Agreement between the Federal Transit Administration and the Minnesota State Historic Preservation Office*. Execution ready version, June 2016



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**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

WHEREAS, the Metropolitan Council (COUNCIL) is proposing to construct the Blue Line Extension Light Rail Transit Project (PROJECT), an approximately 13-mile long double-track light rail transit line (LRT) located in dedicated right-of-way, with eleven (11) new stations, five (5) park-and-ride facilities, and one Operations and Maintenance Facility (OMF), beginning at a connection with the METRO Green Line and METRO Blue Line LRT lines at the existing Target Field Station in Minneapolis, and extending along a northwesterly alignment to connect the cities of Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park, Minnesota; and

WHEREAS, the United States Department of Transportation, Federal Transit Administration (FTA) may fund the PROJECT and has determined it is an undertaking subject to the requirements of Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), and its implementing regulations, 36 CFR § 800; and

WHEREAS, the United States Army Corps of Engineers (USACE) may issue permits to construct the PROJECT pursuant to 33 U.S.C. §§ 11 and 404 of the Clean Water Act (Section 404), 33 U.S.C. § 1251-1376, as amended, and has determined this is an undertaking subject to the requirements of Section 106 and 36 CFR § 800; and

WHEREAS, pursuant to 36 CFR § 800.2(a)(2) USACE has recognized FTA as the lead Federal agency for the PROJECT to fulfill their collective responsibilities under Section 106 and, therefore, does not need to be a signatory to this Memorandum of Agreement (AGREEMENT); and

WHEREAS, pursuant to 36 CFR § 800.1(a)(3) FTA has designated the professionally qualified staff of the Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU) to assist with some aspects of the Section 106 review process, including initiating the consultation process, defining the area of potential effect (APE), identifying historic properties, assessing effects, and coordinating consultation with concurring parties; and

WHEREAS, the COUNCIL is the local sponsor for the PROJECT and is responsible for obtaining the necessary approvals and permits to undertake the PROJECT; and

WHEREAS, FTA, MnDOT CRU, and the COUNCIL have consulted with the Minnesota Historic Preservation Office (MnHPO), interested and affected Indian Tribes, and other parties with a

demonstrated interest in the effects of the PROJECT on historic properties in accordance with Section 106 and 36 CFR § 800; and

WHEREAS, pursuant to 36 CFR § 800.16(d) FTA and MnDOT CRU, in consultation with MnHPO, have defined the APE for the PROJECT as shown in **Attachment A** to this AGREEMENT; and

WHEREAS, FTA, MnDOT CRU, and the COUNCIL, in consultation with MnHPO, have undertaken surveys of the PROJECT APE to identify historic properties that are listed in or eligible for listing in the National Register of Historic Places (NRHP), the results of which are shown in **Attachment B** to this AGREEMENT, and MnHPO has concurred with these determinations; and

WHEREAS, FTA has found, based on the PROJECT's approximately 15 percent design plans (15% Plans), and MnHPO has concurred, that the construction of the PROJECT will have no adverse effect on the following six (6) historic properties: Bridge No. L9327; Jones-Osterhus Barn; Minneapolis & Pacific Railway / Soo Line Railway Historic District; Minneapolis Warehouse Historic District; St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District; and Northwestern Knitting Company; and

WHEREAS, FTA has found, based on the PROJECT's 15% Plans, and MnHPO has concurred, that the construction of the PROJECT will have no adverse effect on the following five (5) historic properties, provided measures identified in the stipulations of this AGREEMENT are implemented: Hennepin County Library; Robbinsdale Branch; Labor Lyceum; Robbinsdale Waterworks; Sacred Heart Catholic Church; and Sumner Branch Library; and

WHEREAS, FTA has found, based on the PROJECT's 15% Plans, and MnHPO has concurred, that the construction of the PROJECT will have an adverse effect on the following six (6) historic properties: Floyd B. Olson Memorial Statue; Grand Rounds Historic District (GRHD): Theodore Wirth Segment; Homewood Historic District; Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District; Wayman African Methodist Episcopal Church; and West Broadway Avenue Residential Historic District; and

WHEREAS, subsequent to FTA issuing its findings of effect and final determination of effect of the PROJECT on historic properties based on the PROJECT's 15% Plans, and MnHPO's concurrence, MnDOT revised the NRHP eligible boundaries of the Floyd B. Olson Memorial Statue based on new information found regarding its original location, and MnHPO and FTA have concurred with the revised boundary as shown in **Attachment C** to this AGREEMENT; and, as a result, FTA has found, based on the revised boundaries, that the PROJECT will no longer have a direct effect on the property, though indirect adverse effects remain; and

WHEREAS, FTA, upon initiation of the 54 U.S.C. § 306108 consultation for the PROJECT, and in accordance with 36 CFR § 800.2(c)(2)(ii), notified the Lower Sioux Indian Community, Upper Sioux Indian Community, Bois Forte Band (Nett Lake) of Minnesota Chippewa, Fond du Lac Band of Minnesota Chippewa, Grand Portage Band of Minnesota Chippewa, Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, Red Lake Tribal Council, White Earth Band of Minnesota Chippewa, Prairie Island

Indian Community, Shakopee Mdewakanton Sioux Community, Bad River Band of Lake Superior Chippewa, Lac Vieux Desert Band of Lake Superior Chippewa, Red Cliff Band of Lake Superior Chippewa, Lac Courte Oreilles Band of Lake Superior Chippewa, Lac du Flambeau Band of Lake Superior Chippewa, St. Croix Chippewa Indians of Wisconsin, Sokaogon (Mole Lake) Chippewa, Turtle Mountain Band of Chippewa, Sisseton-Wahpeton Oyate, Santee Sioux Nation, Flandreau Santee, Fort Peck Tribes, Spirit Lake Tribe, Three Affiliated Tribes, Keweenaw Bay Indian Community, Northern Cheyenne Tribe and the Standing Rock Sioux, all federally recognized tribes, and invited their participation in the consultation and none requested to participate; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

WHEREAS, the COUNCIL is responsible for designing and constructing the PROJECT, as well as carrying out many of the terms of this AGREEMENT, as required, to receive FTA funding and USACE permits, and, therefore, is an invited signatory to this AGREEMENT; and

WHEREAS, MnDOT has responsibilities as owner of the Floyd B. Olson Memorial and MnDOT CRU is responsible for assisting FTA in completing the Section 106 process, and will be providing technical assistance to the PROJECT to complete certain terms and conditions of this AGREEMENT, and, therefore, MnDOT is an invited signatory to this AGREEMENT; and

WHEREAS, the PROJECT will utilize Quiet Zones to minimize and mitigate auditory effects on the West Broadway Avenue Residential Historic District, which is located in Robbinsdale, Minnesota, and, per 49 CFR § 222.37, the City of Robbinsdale is the responsible public authority for requesting Quiet Zone status from the Federal Railroad Administration (FRA) for grade crossings within its city limits and, therefore, is an invited signatory to this AGREEMENT; and

WHEREAS, FTA, MnDOT CRU, and the COUNCIL have consulted with Hennepin County, the Cities of Brooklyn Park, Crystal, Golden Valley, and Minneapolis, the Minneapolis Heritage Preservation Commission, and the Minneapolis Park and Recreation Board (MPRB) regarding the effects of the PROJECT on historic properties in their respective jurisdictions, and has invited them to sign this AGREEMENT as concurring parties; and

WHEREAS, this AGREEMENT was developed with appropriate public involvement pursuant to 36 CFR § 800.2(d) and § 800.6(a), and coordinated with the scoping, public review and comment, and public hearings conducted by FTA and the COUNCIL to comply with the National Environmental Policy Act, as amended, and its implementing regulations; and

WHEREAS, FTA and MnDOT CRU, in consultation with MnHPO and other consulting parties, have assessed potential PROJECT effects on historic properties and have considered ways to avoid, minimize and/or mitigate adverse effects, have agreed upon measures for minimizing and mitigating the identified adverse effects, as outlined in this AGREEMENT, and this AGREEMENT provides for

additional consultation to assess effects and resolve adverse effects in accordance with 36 CFR § 800.14(b)(1)(ii); and

WHEREAS, the COUNCIL shall administer the implementation of the PROJECT and, with the assistance of MnDOT CRU, shall complete the stipulations of this AGREEMENT, and FTA shall be responsible for ensuring that the COUNCIL's implementation of the PROJECT meets the terms of this AGREEMENT.

NOW, THEREFORE, FTA and MnHPO agree that the PROJECT shall be implemented in accordance with the following stipulations in order to take into account the effects of the PROJECT on historic properties.

STIPULATIONS

FTA shall ensure that the COUNCIL, with the assistance of MnDOT CRU, carries out the terms of this AGREEMENT and shall require, as a condition of any approval of FTA funding or USACE permit for the PROJECT, adherence to the stipulations of this AGREEMENT.

I. IDENTIFICATION OF ADDITIONAL HISTORIC PROPERTIES

A. The identification of additional historic properties shall be completed in two ways: through a survey of properties constructed in 1965 or after; and through a survey because of contemplated potential changes in PROJECT scope. Inventories of the PROJECT's archaeological and architecture/history APEs (as depicted in **Attachment A**) have been completed to identify properties constructed in 1965 or earlier, and to evaluate their eligibility for inclusion in the NRHP. The date range selected included properties 50 years in age or older from the estimated start of construction date, which is the typical age range for a property to be considered for historic status without the application of additional criteria. However, because construction of the PROJECT did not start in 2015, additional survey is required of properties constructed after 1965 that will be 50 years of age at the revised time of PROJECT construction to determine their eligibility for inclusion in the NRHP. Therefore, prior to the completion of the 90% design plans (90% Plans); the COUNCIL shall complete the survey of such properties within the PROJECT's architecture/history APE. In addition, if there are changes to the PROJECT's archaeological and/or architecture/history APEs as a result of advancing design, or a change in PROJECT scope, additional inventory and evaluation shall be performed to identify historic properties and evaluate their eligibility for the NRHP as per the requirements of 36 CFR § 800.4(a), including appropriate level of public participation. The following process shall be used to identify and evaluate additional historic properties:

B. Survey and Evaluation

i. The COUNCIL, with the assistance of MnDOT CRU, shall contract with qualified professionals who meet the *Secretary of the Interior's (SOI's) Professional Qualifications*

Standards (36 CFR § 61) for their respective fields to identify additional historic properties and evaluate their eligibility for the NRHP.

- ii.** All survey work shall be conducted in accordance with applicable federal and state laws regarding historic property identification and evaluation, and the standards described in Stipulation XV of this AGREEMENT.
- iii.** FTA, with the assistance of MnDOT CRU, shall oversee the completion of all inventory and evaluation activities to identify additional historic properties and evaluate their eligibility for the NRHP as per the requirements of 36 CFR § 800.4(a), including determining an appropriate level of public participation. If additional potentially eligible properties are identified, MnDOT CRU shall evaluate the property's eligibility under 36 CFR § 800.4(c)(1) and (2) and make a recommendation to FTA.
 - a.** If FTA determines no additional historic properties are eligible for the NRHP, FTA shall issue a finding of No Historic Properties Affected and consult with MnHPO and others as per 36 CFR § 800.4(d)(1). If MnHPO concurs, FTA shall have no further obligations in regards to the property.
 - b.** If FTA identifies additional historic properties eligible for the NRHP, FTA shall issue a determination of eligibility and submit the determination to MnHPO for concurrence. MnHPO shall have thirty (30) calendar days to review and concur with all determinations of eligibility. If MnHPO does not concur, it shall provide comments to FTA on the grounds for its disagreement. FTA shall consult with MnHPO to resolve the disagreement in accordance with Stipulation XVIII of this AGREEMENT.

C. Assessment of Effects

FTA shall make a finding of effect for all additional historic properties determined eligible for the NRHP identified in accordance with Subparagraphs A and B of this Stipulation. FTA, with the assistance of MnDOT CRU, shall complete an assessment of effects for these properties as per 36 CFR § 800.4(d)(2) and 36 CFR § 800.5, and per Stipulation XIV of this AGREEMENT to determine if the PROJECT will have an adverse effect on the historic property.

- i.** MnDOT CRU shall assess effects of the PROJECT on each historic property and forward a recommendation to FTA. FTA shall make a finding of effect for each historic property and submit the finding to MnHPO and the concurring parties for review.
 - a.** If FTA makes a No Adverse Effect finding, MnHPO and the concurring parties shall have thirty (30) calendar days to provide comments on FTA's findings of effect. If MnHPO concurs, no further consultation is required, pending implementation of any conditions on which the finding is based, if any.

- b. If FTA makes an Adverse Effect finding, FTA shall consult with MnHPO and the concurring parties in accordance with Stipulation XIV of this AGREEMENT.

II. PROJECT DESIGN DEVELOPMENT

The PROJECT design will effectively meet the PROJECT purpose and need, while avoiding, minimizing, and/or mitigating adverse impacts to the environment, including adverse effects to historic properties. Avoidance of adverse effects to historic properties is the preferred option, to the extent feasible. The review and findings of effects for the 15% Plans have been completed prior to the signing of this AGREEMENT and an Adverse Effect finding was made for the PROJECT (see WHEREAS clauses for findings of effects for individual historic properties).

A. PROJECT Design to the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68)

All PROJECT elements (including, but not limited to, the guideway, bridges, stations, platforms, shelters, ramps, walkways, overhead power system, traction power substations [TPSSs], signal bungalows, street and streetscape improvements, landscaping, and public art) within the PROJECT segments listed below, and as shown in **Attachment D** to this AGREEMENT, will be designed in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68) when feasible. The geographic limits of this requirement are:

- Minneapolis-Golden Valley Segment: From a point beginning where the PROJECT alignment crosses Bryant Avenue North in Minneapolis, and extending west and northwesterly along the PROJECT alignment to a point 500 feet northwest along the PROJECT alignment from the northwestern corner of the GRHD: Valley View Park/Glenview Terrace Park.
- Robbinsdale Segment: From a point beginning at approximately 40½ Avenue North, or 350 feet southeast along the PROJECT alignment from the southern right-of-way limit of the 41st Avenue North/Noble Avenue North crossing, and extending northwesterly along the PROJECT alignment to include the entirety of the PROJECT's bridge over Trunk Highway (TH) 100 and its northern approach.

The purpose of this requirement is to: 1) avoid adverse effects to the Sumner Branch Library, Labor Lyceum, Sacred Heart Catholic Church, Robbinsdale Waterworks, and the Hennepin County Library, Robbinsdale Branch; and 2) minimize effects, including adverse effects, to the Floyd B. Olson Memorial Statue, GRHD: Theodore Wirth Segment, Homewood Historic District, and West Broadway Avenue Residential Historic District.

As design continues, if the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68) cannot be fully met, FTA, the COUNCIL, MnDOT CRU, and the concurring parties to this AGREEMENT will proceed in accordance with Stipulation XIV of this AGREEMENT.

B. Consultation on PROJECT Design

During PROJECT design development FTA, the COUNCIL, and MnDOT CRU shall continue to consult with MnHPO, concurring parties, and the public, as appropriate, on the design of PROJECT elements within the segments identified in Subparagraph A of this Stipulation to consider ways to minimize effects on historic properties and address design concerns. If, in accordance with Stipulation I of this AGREEMENT, any additional historic properties are identified, the consultation shall also include the consideration of design of PROJECT elements within, and in the vicinity of, the newly identified historic properties.

- i.** Consultation meetings shall be held with MnHPO and the concurring parties at the following points in PROJECT design development to gain input and consider design concerns.
 - a.** Prior to the completion of the 30% percent design plans (30% Plans), the COUNCIL shall consult to gain input to inform the design of the 30% Plans. As feasible, the COUNCIL shall incorporate comments received from MnHPO and the concurring parties through this consultation into the design of the final 30% Plans. FTA shall submit the final 30% Plans to MnHPO and to the concurring parties for review in accordance with Stipulation III.C of this AGREEMENT.
 - b.** After the completion of the 30% Plans, but prior to the completion of the 60% percent design plans (60% Plans), the COUNCIL shall consult to gain input to inform the design of the 60% Plans. As feasible, the COUNCIL shall incorporate comments received from MnHPO and the concurring parties through this consultation into the design of the final 60% Plans. FTA shall submit the final 60% Plans to MnHPO and to the concurring parties for review in accordance with Stipulation III.C of this AGREEMENT.
 - c.** After the completion of the 60% Plans, but prior to the completion of the 90% percent design plans (90% Plans), the COUNCIL shall consult to gain input to inform the design of the 90% Plans. As feasible, the COUNCIL shall incorporate comments received from MnHPO and the concurring parties through this consultation into the design of the final 90% Plans.
- ii.** FTA, with the assistance of MnDOT CRU, shall ensure that any commitments reached during the consultation process outlined in Stipulations II and III of this AGREEMENT are incorporated into the 100% design plans (100% Plans).

III. PRE-CONSTRUCTION DESIGN REVIEW PROCESS

MnDOT CRU shall review and compare the PROJECT's 30% Plans, 60% Plans, 90% Plans, and 100% Plans, as well as any modifications to the approved 100% Plans, prior to initiating PROJECT construction with the PROJECT's approved 15% Plans. The purpose of this review shall be to determine if there are any substantive changes to the PROJECT design; that the portions of the PROJECT identified in Stipulation II.A of this AGREEMENT meet the *SOI's Standards for the Treatment of Historic*

Properties (36 CFR § 68); and that any other design related requirements of this AGREEMENT have been satisfied.

- A. If MnDOT CRU determines that there are no substantive changes, defined as design variations that would necessitate a revision of the PROJECT's APE and/or result in an additional adverse effect; and that all design-related requirements of the AGREEMENT have been met, they shall inform FTA. If FTA agrees, it shall issue a notice to MnHPO that the reviews were completed, no substantive changes were identified and that all design requirements of this AGREEMENT have been met, and, therefore, no further Section 106 review is needed and that the findings made based on the PROJECT's 15% Plans remain valid.
- B. If MnDOT CRU identifies substantive changes, as defined in Subparagraph A of this Stipulation, or that the design requirements of this AGREEMENT have not been met, MnDOT CRU shall make a recommendation on the effects of the design changes on any historic properties, or effects resulting from the inability of the PROJECT to meet the design requirements stipulated in this AGREEMENT to FTA. If FTA agrees that there is a change of effect to a historic property, or that the design requirements stipulated in this AGREEMENT have not been met, FTA shall consult with MnHPO and the concurring parties on the changes to the PROJECT, or the inability of the PROJECT to meet the design requirements of this AGREEMENT, and, if necessary, will issue new findings of effect.
 - i. If FTA makes a No Adverse Effect finding, MnHPO and the concurring parties shall have thirty (30) calendar days to provide comments on FTA's findings of effect. The COUNCIL and FTA shall carefully consider any comments provided by MnHPO and concurring parties to this AGREEMENT and incorporate suggested modifications, as appropriate. If there are any comments from MnHPO or the concurring parties that are not feasible to incorporate into PROJECT plans, the COUNCIL shall provide an explanation to FTA. If FTA agrees, it shall issue a notice to MnHPO and the concurring parties.
 - ii. If FTA makes an Adverse Effect finding, FTA shall follow the measures outlined in Stipulation XIV of this AGREEMENT.
- C. FTA, with assistance from MnDOT CRU, shall submit the final 30% Plans and 60% Plans to MnHPO for concurrence and to the concurring parties to this AGREEMENT for review. MnHPO shall have thirty (30) days to concur with the 30% Plans and the 60% Plans and the concurring parties shall have thirty (30) calendar days to provide comments on each of these plan sets.

IV. CONSTRUCTION PROTECTION PLAN

Prior to initiating PROJECT construction (defined as demolition activities and earthwork, and construction of PROJECT infrastructure and related improvements), the COUNCIL, with the assistance of MnDOT CRU, shall develop a Construction Protection Plan (CPP) in consultation with FTA and MnHPO detailing the measures to be implemented during PROJECT construction to avoid and minimize adverse effects to historic properties. The COUNCIL shall include the CPP within specific contract

packages to inform contractors of their responsibilities relative to historic properties. This plan may be a separate document or combined with other PROJECT construction monitoring plans, as appropriate. The CPP shall include the following:

- A.** Construction Protection Measures (CPMs). The CPP shall detail the measures to be implemented during PROJECT construction to protect the following historic properties from physical damage or indirect adverse effects during the construction of the PROJECT: Sumner Branch Library; Floyd B. Olson Memorial Statue; GRHD: Theodore Wirth Segment; Homewood Residential Historic District; Robbinsdale Waterworks; Hennepin County Library, Robbinsdale Branch; and West Broadway Avenue Residential Historic District.
 - i.** The CPMs shall include:
 - a.** Inspection and documentation of existing conditions of each historic property (e.g., limits of the site, dimensions of the structure, photographs of the property, aerial photographs as required, assessment of geological conditions, identification of ancillary structures in the vicinity of the property), and
 - b.** Establishment of protection measures and procedures for each historic property to be implemented during PROJECT construction.

- B.** Vibration Management and Remediation Measures (VMRMs). The CPP shall address issues related to ground-borne vibrations caused by PROJECT construction on the following historic properties: Robbinsdale Waterworks; Hennepin County Library, Robbinsdale Branch; and West Broadway Avenue Residential Historic District.
 - i.** VMRMs shall include:
 - a.** Pre- and post-construction survey. The CPP shall include a schedule and methodology for a pre-construction survey of each historic property subject to VMRMs. This survey shall provide a baseline of existing structural and physical conditions to facilitate later identification of any structural and/or cosmetic damage caused by PROJECT construction. A post-construction survey of these properties shall identify any changes from pre-construction condition and assess possible cause of these changes, and
 - b.** Construction vibration thresholds and monitoring. The CPP shall include a methodology for monitoring vibration during PROJECT construction at the historic properties subject to VMRMs. It shall specify thresholds for vibration during construction for each historic property and shall include details about the monitoring process, monitoring equipment (e.g., crack-monitoring gauges), documentation standards, and frequency of monitoring. Thresholds shall be set using guidance from FTA's *Transit Noise and Vibration Impact Assessment Manual*. If the COUNCIL determines as a result of the pre-construction survey that a lower threshold is required for a historic property due to its structural

condition, the COUNCIL shall submit to FTA documentation to support a different threshold for FTA's review and approval.

- ii.** Reporting. The CPP shall include provisions for timely reporting of the results of the pre- and post-construction surveys and construction monitoring efforts to MnHPO and owners of historic properties subject to VMRMs.
 - iii.** All owners of historic properties subject to VMRMs shall be consulted regarding the VMRMs provisions of the CPP. As part of this consultation, the COUNCIL shall provide information to the owners of historic properties on the purpose of, and process for completing, the pre- and post-construction surveys, other work under the plan, and the process for substantiating damages and for seeking remediation for substantiated damage claims, should damage result from construction of the PROJECT. Any agreements with owners of historic properties that contain provisions related to vibration issues shall be consistent with the provisions of the VMRMs. Copies of such agreements shall be included as part of the VMRMs included in the CPP and provided to MnHPO.
 - iv.** The team preparing the VMRMs for the CPP shall include: a structural engineer with at least five (5) years of experience working with historic properties, an architect who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for historic architecture, and a historian and/or architectural historian who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for architectural history.
- C.** Unexpected discoveries. The CPP shall include a plan for the unexpected discovery of archaeological resources. The plan for unexpected discoveries shall be developed in accordance with Stipulation XIII of this AGREEMENT.
- D.** The draft CPP, including all measures identified in Subparagraphs A through C of this Stipulation, shall be submitted to FTA for review and approval. Once FTA's comments are incorporated, the draft CPP shall be submitted to MnHPO, the concurring parties, and owners of the historic properties identified under this Stipulation. MnHPO the concurring parties, and owners of the historic properties shall have thirty (30) calendar days to provide comments on the CPP. The COUNCIL shall consider all comments received and use them to prepare the final CPP. If there are any comments from MnHPO or the concurring parties that are not viable to incorporate into the CPP, the COUNCIL shall provide an explanation to FTA. If FTA agrees with the COUNCIL's assessment that suggestions cannot be incorporated, FTA shall notify MnHPO and the concurring parties. If agreement cannot be reached on whether their suggestions are viable to incorporate, FTA shall consult with the COUNCIL, MnHPO, and the concurring parties as per the terms of Stipulation XVIII of this AGREEMENT. The COUNCIL shall submit the final CPP to FTA for approval. Upon FTA approval, the final CPP shall be submitted to MnHPO for review. MnHPO shall have thirty (30) calendar days to review and concur with the final CPP. This review shall be completed prior to initiating PROJECT construction.

- E.** Before PROJECT construction activities begin in the vicinity of the historic properties subject to this Stipulation, the COUNCIL and MnDOT CRU shall meet with the construction contractor(s) to review the CPP, and confirm that construction plans are consistent with the PROJECT design as reviewed by FTA and MnHPO.
- F.** The COUNCIL and MnDOT CRU shall monitor PROJECT construction to ensure that all measures identified in the CPP are implemented and shall provide a record of monitoring activities in the quarterly reports prepared pursuant to Stipulation XVI of this AGREEMENT.

V. NOISE MITIGATION

- A.** Quiet Zones. The COUNCIL shall incorporate Quiet Zone infrastructure into the PROJECT design for the following grade crossings to minimize and mitigate moderate and severe auditory impacts on the Sacred Heart Catholic Church; Hennepin County Library, Robbinsdale Branch; and West Broadway Avenue Residential Historic District. Quiet Zone infrastructure will be installed for the following grade crossings:
 - 39½ Avenue North/40th Avenue North
 - 41st Avenue North/Noble Avenue North
 - 42nd Avenue North
 - i.** Quiet Zone infrastructure that is located within the PROJECT segments identified in Stipulation II.A of this AGREEMENT shall be designed in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68).
 - ii.** The City of Robbinsdale shall be responsible for requesting Quiet Zone status from the Federal Railroad Administration (FRA) for those PROJECT areas within the City of Robbinsdale. Quiet Zones are locations, at least 0.5 mile in length, where the sounding of horns has been eliminated because of safety improvements at at-grade crossings. The COUNCIL shall be responsible for coordinating diagnostic and other meetings, as required, with FRA, the City of Robbinsdale and PROJECT stakeholders and shall provide assistance, as requested, to the City of Robbinsdale in preparing the Quiet Zone application. If the FRA does not grant Quiet Zone status for those PROJECT areas within the City of Robbinsdale, FTA and the COUNCIL, with the assistance of MnDOT CRU, shall consult with MnHPO to develop alternative mitigation and means of resolving auditory effects on historic properties.
- B.** Property Specific Noise Mitigation. With Quiet Zone implementation, three (3) properties within the Homewood Residential Historic District, Minneapolis, and two (2) properties within the West Broadway Avenue Residential Historic District, Robbinsdale, may still be adversely affected by moderate auditory impacts from PROJECT operation (Table 1).

Table 1. Historic Properties to Receive Interior Sound Testing

Inventory No.	Property Name	Address	City
HE-MPC-12101	Homewood Residential Historic District		
HE-MPC-10807	House	2916 Oak Park Ave.	Minneapolis
HE-MPC-10808	House	2924 Oak Park Ave.	Minneapolis
HE-MPC-7624	Henry Greenstein House	1015 Xerxes Ave. N.	Minneapolis
HE-RBC-158	West Broadway Avenue Residential Historic District		
HE-RBC-092	House	4345 West Broadway Ave.	Robbinsdale
HE-RBC-147	House	4351 West Broadway Ave.	Robbinsdale

- i.** Interior Testing. The COUNCIL shall conduct on-site interior testing in the five (5) properties identified in Table 1 to determine whether they meet the interior noise level criteria (45 dBA Ldn). The interior testing shall be completed prior to the initiation of PROJECT construction and the results shall be provided to FTA and MnDOT CRU.

- ii.** No Adverse Effect. If the interior testing required by Subparagraph B.i of this Stipulation determines that interior noise levels will not exceed the interior noise level criteria (45 dBA Ldn), FTA, with the assistance of MnDOT CRU, shall issue a finding of No Adverse Effect and notify MnHPO and the concurring parties to this AGREEMENT that the testing was completed, that a finding of No Adverse Effect has been made, and, therefore, no further Section 106 review is needed. MnHPO and the concurring parties shall have thirty (30) calendar days to provide comments on FTA’s findings of effect.

- iii.** Adverse Effect. If the interior testing required by Subparagraph B.i of this Stipulation determines an exceedance of interior noise level criteria (45 dBA Ldn), FTA shall issue a notice to MnHPO, the owners of the properties, and the concurring parties to this AGREEMENT that the testing was completed and that the finding of Adverse Effect remains valid. FTA and the COUNCIL, with the assistance of MnDOT CRU, shall then consult with MnHPO and the owners of the properties to develop a Noise Mitigation Plan in accordance with the *SOI’s Standards for the Treatment of Historic Properties* (36 CFR § 68) that is appropriate to the properties and the nature and scale of the effect.
 - a.** MnDOT CRU shall review the draft Noise Mitigation Plan for sufficiency and forward it with a recommendation to FTA for review. If FTA determines the draft plan is sufficient, it shall submit the plan to MnHPO and the owners of the historic properties. MnHPO and the owners of the historic properties shall have thirty (30) calendar days to provide comments on the draft plan.

 - b.** A final Noise Mitigation Plan shall be prepared that incorporates feasible recommendations made by MnHPO and the owners of the historic properties on the draft plan. MnDOT CRU shall review the final plan for sufficiency and forward it with a recommendation to FTA for review. If FTA determines the plan is sufficient, FTA shall submit the plan to MnHPO for concurrence and to the owners of the historic properties

for their acceptance. MnHPO and the owners of the properties shall have thirty (30) calendar days to review and comment on the plan. If MnHPO does not concur, or if the owners of the properties do not accept the plan, FTA shall consult with MnHPO and the owners of the properties to resolve the disagreement in accordance with Stipulation XVIII of this AGREEMENT.

VI. NATIONAL REGISTER OF HISTORIC PLACES NOMINATIONS

A. The COUNCIL, with the assistance of MnDOT CRU, and in consultation with MnHPO, shall prepare NRHP nomination forms, in conformance with the guidelines of the National Park Service (NPS), for the following historic properties:

- Floyd B. Olson Memorial, and
- Wayman African Methodist Episcopal Church.

The nominations shall be prepared by a historian and/or architectural historian who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for history and architectural history, and who has successfully completed previous NRHP nominations for similar historic properties.

- i.** The COUNCIL, with the assistance of MnDOT CRU, shall prepare draft NRHP nomination forms and submit them to MnHPO for review. MnHPO shall have sixty (60) calendar days to provide comments on the initial draft of each nomination. All subsequent drafts of the NRHP nomination forms shall incorporate recommendations made by MnHPO. As needed, multiple drafts may be required and MnHPO shall have sixty (60) calendar days to provide comments on any subsequent drafts. This Stipulation shall be met upon issuance of a written determination by MnHPO that the draft NRHP nomination forms for each historic property meet the requirements for scheduling the nominations on a State Historic Preservation Review Board agenda. The COUNCIL shall receive written determination from MnHPO that both nomination forms meet the requirements for scheduling the nomination on a State Historic Preservation Review Board agenda no later than one (1) year from the date the PROJECT commences revenue service operations.
- ii.** Actual nomination of the Memorial and the Church to the NRHP will be at the discretion of MnHPO and shall follow the established procedures of the NPS (36 CFR § 60). In accordance with 36 CFR § 60.6(g), the property owners shall be given the opportunity to object to listing their property in the NRHP.

VII. INTERPRETATION OF HISTORIC PROPERTIES

A. Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway. The COUNCIL shall incorporate interpretation (per the NPS, “interpretation is a form of education that seeks to make connections between historic places and history, between the lives we lead today and the lives that once filled these spaces” with the ultimate goal being “to

encourage an appreciation of the importance of historic places and a commitment to preserving them for future generations”¹ of the Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway into the design of the PROJECT segment that will utilize the Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District. The interpretation shall be based on the results of the Phase II evaluation completed for the historic property during the identification stage of the PROJECT and additional research that shall be completed to inform the content of the interpretation. Interpretation shall be incorporated into the design all five (5) of the PROJECT stations that will be located within the historic district corridor: Plymouth Avenue, Golden Valley Road, Robbinsdale, Bass Lake Road, and 63rd Avenue; and into the PROJECT related trail improvements along the historic district corridor.

- B.** Grand Rounds Historic District: Theodore Wirth Segment. The COUNCIL shall incorporate interpretation of the GRHD: Theodore Wirth Segment into the design of the PROJECT’s Plymouth Avenue and Golden Valley Road stations (station platforms and vertical circulation towers), and at the trailhead for the Golden Valley Road Station that is required by Stipulation X.A.ii of this AGREEMENT. The interpretation shall be based on the results of the draft NRHP nomination for the GRHD, the cultural landscape study completed by the PROJECT for Theodore Wirth Park (see Stipulation X.B), the MPRB’s 2015 master plan for Theodore Wirth Park, and additional research that shall be completed to inform the content of the interpretation.

- C.** Interpretative Plan. The COUNCIL, with the assistance of MnDOT CRU, shall develop a plan for the interpretation stipulated in this section in conformance with the *Standards and Practices for Interpretive Planning from the National Association for Interpretation (NAI)* and *Creating Outdoor Trail Signage* technical leaflets.² The team preparing the interpretative plan shall include a qualified historian who meets the *SOI’s Professional Qualifications Standards* (36 CFR § 61) for history, and an interpretative planner certified by the National Association for Interpretation (NAI) as a Certified Interpretive Planner.
 - i.** A draft interpretative plan shall be prepared that includes themes and locations for the interpretation, schematic plans, and draft text and graphics for the interpretation. MnDOT CRU shall review the draft interpretive plan for sufficiency and forward it with a recommendation to FTA for review. If FTA determines the draft plan is sufficient, it shall submit the plan to MnHPO and the concurring parties. MnHPO and the concurring parties shall have thirty (30) calendar days to provide comments on the draft plan.

¹ Thomson, Ronald Bruce, and Marilyn Harper

2000. *Telling the Stories: Planning Effective Interpretive Programs for Properties Listed in the National Register of Historic Places*. [Washington, D.C.]: U.S. Dept. of the Interior, National Park Service, National Register, History and Education.

² Miller, Ellen, and Aaron Novodorsky

2008 *Creating Outdoor Trail Signage, Part 1: Planning and Design Minnesota History Interpreter*, 2008 (May-June), 3-6.

2008 *Tech Talk: Creating Outdoor Trail Signage, Part 2: Fabrication and Installation Minnesota History Interpreter*, 2008 (Summer), 3-6.

- a. During the development of the draft interpretative plan, the COUNCIL, with the assistance of MnDOT CRU, shall consult with MnHPO and the concurring parties to gain input and the type, amount, and exact locations of the interpretation required by Subparagraphs A and B of this Stipulation.
- ii. A final interpretative plan shall be prepared that includes the final content and design of interpretation. As feasible, the final plan shall incorporate any recommendations made by MnHPO and the concurring parties on the draft plan. MnDOT CRU shall review the final interpretive plan for sufficiency and forward it with a recommendation to FTA for review. If FTA determines the final plan is sufficient, FTA shall submit the plan to MnHPO for concurrence. MnHPO shall have thirty (30) calendar days to review and concur with the final plan. If MnHPO does not concur, it shall provide comments to FTA on the grounds for its disagreement with the plan. Upon receiving such comments, FTA shall consult with MnHPO to resolve the disagreement in accordance with Stipulation XVIII of this AGREEMENT.
- iii. The final interpretive plan shall be incorporated into the PROJECT's 100% Plans.
- iv. Before the PROJECT commences revenue service operations, the content of the interpretation shall be developed into a webpage and placed on the MnDOT CRU website, and also provided to MnHPO to place on the MnHPO or Minnesota Historical Society (MNHS) website in order to make it accessible to the general public.

VIII. FLOYD B. OLSON MEMORIAL

- A. Historic Property Treatment Plan. The COUNCIL, with the assistance of MnDOT CRU, and in consultation with MnHPO, MnDOT Office of Land Management (OLM), and MnDOT Metro District, shall prepare a Historic Property Treatment Plan for the Floyd B. Olson Memorial. The plan shall be prepared in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68); the *SOI's Standards for Preservation Planning*; the NPS's *Guidelines for the Treatment of Cultural Landscapes*, Preservation Briefs and Tech Notes; and NRHP guidance for moved properties. The plan shall be prepared by a historian and/or architectural historian who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for history and architectural history; a landscape architect who has a combination of education and experience in landscape architecture equivalent to the *SOI's Professional Qualifications Standards* (36 CFR § 61) for historic architect; and a conservator with experience in conserving bronze sculpture who has a combination of education and experience to meet the requirements for a Professional Associate or Fellow of the American Institute for Conservation of Historic & Artistic Works. All persons working on the plan shall have successfully completed previous treatment plans for similar historic properties.
 - i. The Historic Property Treatment Plan shall include recommendations on the following items:
 - a. Location. Since the Memorial has been moved once and is located in an area identified for redevelopment, the plan shall present recommendations on the most appropriate

locations for the Memorial, including consideration of remaining in its current location (see **Attachment A**). While the Memorial must remain proximate to Olson Memorial Highway (TH 55) and Floyd B. Olson's boyhood home in order to maintain its integrity of setting, feeling and association, the plan shall explore if it could be relocated to allow for partial or full redevelopment of the current site while improving the Memorial's setting and association with TH 55. Research shall be completed as part of the development of the plan to determine either the artist's and/or the community's intent in the Memorial's original location, as well as its present location. All recommendations regarding the potential location of the Memorial shall be limited to those that maintain its eligibility for the NRHP. The Memorial is designated as a State Monument under Minnesota Statue 138.585, but this title does not afford any protections or limitations to the property. It was already designated a State Monument when it was first moved.

- b.** Orientation. When the Memorial was moved in 1984, its orientation was switched from facing east to facing north. Research shall be completed as part of the development of the plan to determine either the artist's and/or the community's intent having the Memorial originally facing east. The plan shall present a recommendation on its future orientation based on this research and any proposed location as per Subparagraph A.i.a of this Stipulation.
- c.** Appropriate Setting. The plan shall present recommendations on the appropriate setting (i.e., proximity to TH 55, site size, site design, landscaping, etc.) for the Memorial based on the design of the original site located in the median of TH 55, the current design, and opportunities or restrictions based on location options.
- d.** Design Parameters. The plan shall improve and enhance the setting of the existing site. Items that shall be considered include: 1) designing an appropriate site plan to improve and enhance the setting of the Memorial in its present location and 2) designing an appropriate site plan(s) that includes relocating and/or reorienting the Memorial on its present site to improve and enhance the setting of the Memorial and strengthen its association with TH 55.

All design parameters shall comply with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68) and the NPS's *Guidelines for the Treatment of Cultural Landscapes*, and shall include recommendations on the size of site, site dimensions, design of the site, including landscaping and site features and furnishing, materials, and plantings. All recommendations shall include retaining the base, pedestal, and benches historically associated with the Memorial.

- ii.** During the development of the draft and final plan, the COUNCIL, with the assistance of MnDOT CRU, shall consult with MnHPO, MnDOT OLM, and MnDOT Metro District, as appropriate, to gain input to inform the development of the plan.

iii. Review of Historic Property Treatment Plan

- a.** MnDOT CRU shall review the draft Historic Property Treatment Plan for sufficiency and forward it to FTA for review, with a recommendation on the approach that best meets the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68), the NPS's *Guidelines for the Treatment of Cultural Landscapes*, and NRHP guidance for moved properties. If FTA determines the draft plan is sufficient, it shall submit the plan to MnHPO, MnDOT OLM, MnDOT Metro District, and the concurring parties. MnHPO, MnDOT OLM, MnDOT Metro District, and concurring parties shall have thirty (30) calendar days to provide comments on the draft plan.
 - b.** As feasible, the final Historic Property Treatment Plan shall incorporate any recommendations made by MnHPO, MnDOT OLM, and MnDOT Metro District on the draft plan. MnDOT CRU shall review the final plan for sufficiency and forward it to FTA for review, with a recommendation on the approach that best meets the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68), the NPS's *Guidelines for the Treatment of Cultural Landscapes*, and NRHP guidance for moved properties. If FTA determines the plan is sufficient, FTA shall submit the plan to MnHPO for concurrence and to MnDOT OLM and MnDOT Metro District for acceptance. MnHPO, MnDOT OLM, and MnDOT Metro District shall have thirty (30) calendar days to review and comment on the plan. During this period, FTA, with the assistance of MnDOT CRU, shall consult with MnHPO, MnDOT OLM, and MnDOT Metro District to select an alternative to be implemented in accordance with Subparagraph B of this Stipulation. If MnHPO does not concur with the final plan, or if MnHPO, MnDOT OLM and MnDOT Metro District do not agree on the alternative to be implemented in accordance with Subparagraph B of this Stipulation, FTA shall consult with MnHPO, MnDOT OLM, and MnDOT Metro District to resolve the disagreement in accordance with Stipulation XVIII of this AGREEMENT.
- B.** Site Improvements. Based on the conclusions in the treatment plan required by Subparagraph A of this Stipulation, the COUNCIL, with the assistance of MnDOT CRU, shall design and construct the selected alternative as per Subparagraph A.iii.b of this Stipulation. The site improvements shall be designed in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68) and the NPS's *Guidelines for the Treatment of Cultural Landscapes*, Preservation Briefs and Tech Notes. The design for the improvements shall be reviewed in accordance with Stipulation III of this AGREEMENT. Construction of the site improvements shall be completed no later than one (1) year from the date the PROJECT commences revenue service operations.

IX. OSSEO BRANCH OF THE ST. PAUL, MINNEAPOLIS & MANITOBA RAILROAD / GREAT NORTHERN RAILWAY HISTORIC DISTRICT

- A.** Phase II Intensive Level Inventory and Evaluation of Historic Railroad Line(s) in Minnesota. The COUNCIL, with the assistance of MnDOT CRU, and in consultation with MnHPO, shall conduct

a Phase II, intensive level architecture/history survey of historic railroad line(s) in Minnesota. Either one (1) mainline across the entire State of Minnesota, or up to a total of five (5) shorter mainlines and/or branch lines shall be evaluated. Associated properties types, as identified in the NRHP Multiple Property Documentation Form *Railroads in Minnesota, 1862-1956*, shall also be documented.

- i. FTA, with the assistance of MnDOT CRU, shall consult with MnHPO to identify the railroad line(s) to be inventoried and evaluated, and to develop a scope for the survey. As feasible, preference shall be given to railroad lines owned and/or operated by the Great Northern Railway and its predecessor lines.
- ii. The survey shall be completed in accordance with Stipulations I.B and XV of this AGREEMENT and shall be conducted by a historian who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for history and architectural history, and who has successfully completed previous intensive level surveys of railroads.
 - a. MnDOT CRU shall review the inventory form(s) for sufficiency. Once MnDOT CRU determines the inventory form(s) is sufficient, MnDOT CRU shall submit the inventory form(s) to FTA with a recommendation on the property's eligibility for the NRHP. If FTA determines the inventory form(s) is sufficient, FTA shall issue its determination of eligibility and submit the form to MnHPO for concurrence. MnHPO shall have thirty (30) calendar days to review and concur with the evaluation(s). If MnHPO does not concur, it shall provide comments to FTA on the grounds for its disagreement with the inventory forms. Upon receiving such comments, FTA shall consult with MnHPO to resolve the disagreement in accordance with Stipulation XVIII of this AGREEMENT. The final inventory forms shall be completed and receive MnHPO concurrence no later than one (1) year from the date the PROJECT commences revenue service operations.

X. GRAND ROUNDS HISTORIC DISTRICT

- A. Design Development of PROJECT Elements Within, and in the vicinity of, the GRHD. As described in Stipulation II.A of this AGREEMENT the COUNCIL shall design all PROJECT elements within, and in the vicinity of, the GRHD: Theodore Wirth Segment in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68). In addition, PROJECT elements within, and in the vicinity of, the GRHD: Theodore Wirth Segment shall also be designed in accordance with the NPS's *Guidelines for the Treatment of Cultural Landscapes*. As part of the PROJECT design development careful consideration shall be given to designing PROJECT infrastructure, as well as alterations to the landscape, to screen and minimize views of PROJECT infrastructure, including visual prominence, from views within, and of, the historic district during all seasons as well as during daytime and nighttime conditions.
 - i. Vegetation. As part of PROJECT design development, careful consideration shall be given to designing PROJECT infrastructure, as well as alterations to the landscape, to 1) minimize the net loss of existing vegetation and 2) design new landscaping to screen and minimize the

COUNCIL shall obtain MnHPO concurrence on the final scope prior to preparing the plan.

- ii. Treatment Plans/Standards/Guidelines (Treatments Plan). Treatments shall be prepared to guide preservation activities for up to twelve (12) different historic features, or feature types within the planning area. Features may include, but are not limited to, retaining walls, shorelines (land-water interfaces), lighting, signage, circulation dividers, circulation systems (e.g. parkway paving), bridges, monuments, and site furnishings. The team preparing the plan shall include an architect who meets the *SOI's Professional Qualifications Standards* (36 CFR § 61) for historic architect, a landscape architect who has education and experience in landscape architecture comparable to the requirements the *SOI's Professional Qualifications Standards* (36 CFR § 61) require for a historic architect, and a civil engineer with at least five years of experience working with historic structures.
 - a. A scope shall be prepared that identifies the features/feature types for which treatments will be prepared, the type and level of documentation to be prepared for each feature, and a process for implementing and approving the plan. The COUNCIL shall obtain MnHPO concurrence on the final scope prior to preparing the plan.
- iii. Review of Plans. The COUNCIL shall submit the plans to MnHPO and MPRB for review in accordance with the processes defined in the final scope for each plan. The COUNCIL shall obtain MnHPO concurrence on the final plans no later than one (1) year from the date the PROJECT commences revenue service operations. The COUNCIL shall also seek MPRB Board of Commissioners approval of the final plans; however, MPRB Board of Commissioners approval of the plans shall not be required for fulfillment of this Stipulation. If the COUNCIL, MnHPO, and MPRB cannot agree on scopes for the plans, or if MnHPO does not concur with the final plans, the COUNCIL shall notify FTA and FTA shall consult with MnHPO and MPRB as per the terms of Stipulation XVIII of this AGREEMENT.

XI. HOMEWOOD RESIDENTIAL HISTORIC DISTRICT

- A. Additional Design Consultation. FTA, the COUNCIL, and MnDOT CRU, understanding the need for PROJECT design in this area to be in accordance with the *SOI's Standards for the Treatment of Historic Properties* (36 CFR § 68)(see Stipulation II.B of this AGREEMENT), shall hold a public meeting with property owners and residents of the Homewood Residential Historic District prior to the completion of the 60% Plans. The purpose of this meeting shall be to gain input to inform the design of PROJECT elements within and in the immediate vicinity (within 500 feet) of the historic district. FTA, the COUNCIL, and MnDOT CRU shall consider the public input from this meeting and will incorporate design changes as a result of this input where feasible.

XII. WEST BROADWAY AVENUE RESIDENTIAL HISTORIC DISTRICT

- A. Additional Design Consultation. FTA, the COUNCIL, and MnDOT CRU, understanding the need for PROJECT design in this area to be in accordance with the *SOI's Standards for the Treatment*

of Historic Properties (36 CFR § 68)(see Stipulation II.B of this AGREEMENT), shall hold a public meeting with property owners and residents of the West Broadway Avenue Residential Historic District prior to the completion of the 60% Plans. The purpose of this meeting shall be to gain input to inform the design of PROJECT elements within and in the immediate vicinity (within 500 feet) of the historic district. FTA, the COUNCIL, and MnDOT CRU shall consider the public input from this meeting and will incorporate design changes as a result of this input where feasible.

XIII. 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, the COUNCIL shall prepare as part of the CPP required by Stipulations IV of this AGREEMENT a plan for the unexpected discovery of archaeological resources.
- 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, and make a recommendation to FTA. If FTA determines there are substantive changes that would result in a new, and/or additional adverse effect, and/or require a revision to the PROJECT's APE, FTA shall consult with MnHPO and the concurring parties in accordance with Stipulations I, XIV, and XVIII of this AGREEMENT, as appropriate.
- 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 in an unanticipated adverse manner, all ground-disturbing activities shall 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 shall immediately notify the COUNCIL of the discovery and implement interim measures in accordance with the unexpected discoveries plan required by Subparagraph A of this Stipulation and Stipulation IV.C of this AGREEMENT to protect the discovery from damage, looting, and vandalism. Measures shall include, but not be limited to, protective fencing and covering of the discovery with appropriate materials. The COUNCIL shall inform MnDOT CRU and concurring parties with jurisdiction over, or a demonstrated interest in, the property. If reasonably convenient and appropriate, the contractor, the COUNCIL, MnDOT CRU, and any concurring parties with jurisdiction over, or a demonstrated interest in the property, 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 artifacts found as part of an unexpected discovery during construction that are part of sites determined not eligible for the NRHP in accordance with Stipulation I of this

AGREEMENT, and for which the property owner has released ownership of the artifacts, will be offered to local historical societies for their collections if desired.

i. Non-Human Remains

- a.** The COUNCIL, with the assistance of MnDOT CRU, shall 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 shall inform MnHPO, any Indian tribes that may attach religious and cultural significance to the property, and concurring parties with jurisdiction over, or a demonstrated interest in the property, of the discovery.

ii. Human Remains

- a.** 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 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 shall have the final authority in determining if the remains are human. The COUNCIL, with the assistance of MnDOT CRU, shall 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 shall inform MnHPO and any Indian tribes that may attach religious and cultural significance to the property, of the discovery.
- b.** 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.

- D.** If a historic property is identified during PROJECT construction, FTA shall issue a determination of eligibility for the property within ten (10) calendar days following notification from the

calendar days of such notification. If more time is required to develop the mitigation plan, the COUNCIL shall notify MnHPO and the concurring parties to this AGREEMENT regarding the reason for the delay and the anticipated timeframe for mitigation plan distribution. FTA shall provide a copy of the draft mitigation plan to MnHPO and the concurring parties. MnHPO and the concurring parties shall have thirty (30) calendar days to provide comments on the draft mitigation plan.

- C. FTA and the COUNCIL shall take into account any timely comments of the MnHPO and concurring parties in the development of final mitigation plans. A mitigation plan shall be final upon acceptance by FTA and MnHPO. Concurring parties shall receive copies of all final mitigation plans and may also be invited to concur in mitigation plans.

XV. STANDARDS

- A. All work carried out pursuant to this AGREEMENT shall meet the *SOI's Standards for Archaeology and Historic Preservation* (48 FR 44716). In instances where it is not feasible to reach a PROJECT design that meets these standards, mitigation measures shall be developed and implemented pursuant to Stipulation XIV of this AGREEMENT.
- B. FTA shall ensure that all activities carried out pursuant to this AGREEMENT shall be done by, or under the direct supervision of, historic preservation professionals who meet the *SOI's Professional Qualifications Standards* (36 CFR § 61) in the appropriate field. The professionally qualified staff in MnDOT CRU shall help FTA and the COUNCIL with oversight of the work. FTA and the COUNCIL shall ensure that consultants it retains for services pursuant to implementation of this AGREEMENT meet these standards.

XVI. MONITORING AND REPORTING

- A. Every three (3) months following the execution of this AGREEMENT until it expires or is terminated, the COUNCIL, with the assistance of MnDOT CRU, shall provide all signatories and concurring parties to this AGREEMENT a summary report detailing work undertaken pursuant to its terms. Each report shall include an itemized listing of all actions required to be taken to implement the terms of the AGREEMENT, identify what actions the COUNCIL has taken during the reporting period to implement those actions, identify any problems or unexpected issues encountered during that time, any scheduling changes proposed, any disputes and objections submitted or resolved in FTA's efforts to carry out the terms of this AGREEMENT, and any changes recommended in implementation of the AGREEMENT. Each report shall also include a timetable of activities proposed for implementation within the following reporting period.
- B. Signatories and concurring parties to this AGREEMENT shall review the quarterly reports and provide any comments to FTA and the COUNCIL within thirty (30) calendar days of receipt of the report.

- C. The COUNCIL shall notify the public via the PROJECT website about the publication of the quarterly reports and that the reports are available for inspection and review upon request.
- D. The COUNCIL shall share any comments received from concurring parties and the public with the signatories and concurring parties to this AGREEMENT.
- E. At its own discretion, or at the request of any signatory to this AGREEMENT, FTA shall convene a meeting to facilitate review and comment on the reports, and to resolve any questions about its content and/or to resolve objections or concerns.

XVII. COORDINATION WITH OTHER FEDERAL REVIEWS

- A. In the event any other federal agency provides funding, permits, licenses, or other assistance to the COUNCIL for the PROJECT as it was planned at the time of the execution of this AGREEMENT, such funding or approving agency may comply with Section 106 by agreeing in writing to the terms of this AGREEMENT and so notifying and concurring with FTA. FTA shall provide copies of all requests of this type to MnHPO.

XVIII. DISPUTE RESOLUTION

- A. Should any party to this AGREEMENT object at any time to any actions proposed or the manner in which the terms of the AGREEMENT are implemented, FTA shall consult with the objecting party (or parties) to resolve the objection and will request ACHP involvement. If ACHP is not able to resolve the objection(s), FTA shall follow 36 CFR § 800.7. All other actions subject to the terms of this AGREEMENT that are not subjects of the dispute remain unchanged pending resolution.
- B. If FTA determines that such objection cannot be resolved, FTA will forward all documentation relevant to the dispute, including FTA's proposed resolution, to the ACHP in accordance with 36 CFR § 800.7(a). The ACHP will provide FTA with its advice on the resolution of the objection within forty-five (45) calendar days of receiving adequate documentation per 36 CFR § 800.7(c)(2). Prior to reaching a final decision on the dispute, FTA will prepare a written response that takes into account any timely advice or comment regarding the dispute from the ACHP, signatories, invited signatories and concurring parties, and provide the parties with a copy of the written response per 36 CFR § 800.7(c)(4). FTA will then proceed according to its final decision.

XIX. DURATION, AMENDMENTS, AND TERMINATION

- A. This AGREEMENT will remain in effect from the date of execution for a period not to exceed ten (10) years. If FTA anticipates that the terms of the AGREEMENT will not be completed within this timeframe, it shall notify the signatories, invited signatories, and concurring parties in writing at least thirty (30) calendar days prior to the AGREEMENT'S expiration date. The AGREEMENT may be extended by the written concurrence of the signatories and invited

signatories. If the AGREEMENT expires and FTA elects to continue with the undertaking, FTA will reinstate review of the undertaking in accordance with 36 CFR § 800.

- B.** If any signatory or invited signatory to the AGREEMENT determines that the terms of the AGREEMENT cannot be fulfilled, or that an amendment to the terms of the AGREEMENT must be made, the signatories or invited signatories will consult to seek an amendment to its terms using the same consultation process as that exercised in creating the original AGREEMENT. FTA shall file any amendments with the ACHP upon execution as per 36 CFR § 800.6(c)(7).
- C.** Any signatory or invited signatory to this AGREEMENT may terminate the AGREEMENT by providing thirty (30) calendar days written notice to the other signatories and invited signatories, provided the signatories or invited signatories consult during the period prior to termination in an attempt to agree on amendments or other actions that would avoid termination. If the AGREEMENT is terminated and FTA elects to continue with the undertaking, FTA will reinstate review of the undertaking in accordance with 36 CFR § 800.

XX. IMPLEMENTATION

- A.** This AGREEMENT may be implemented in counterparts, with a separate page for each signatory or party. This AGREEMENT shall become effective on the date of the final signature by the signatories and invited signatories. The refusal of any party invited to concur in the AGREEMENT does not invalidate the AGREEMENT. FTA shall ensure each party is provided with a complete copy and that the final AGREEMENT, updates to appendices, and any amendments filed with the ACHP.
- B.** Execution of this AGREEMENT by FTA and MnHPO and implementation of its terms is evidence that FTA has taken into account the effects of its undertaking on historic properties and has afforded the ACHP opportunity to comment pursuant to Section 106 of the National Historic Preservation Act.

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

SIGNATORY

FEDERAL TRANSIT ADMINISTRATION

By: _____
Marisol Simón, Region V Administrator

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

SIGNATORY

MINNESOTA HISTORIC PRESERVATION OFFICE

By: _____ Date: _____
Andrea Kajer, Deputy State Historic Preservation Officer

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

INVITED SIGNATORY

METROPOLITAN COUNCIL

By: _____
Wes Kooistra, Regional Administrator

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

INVITED SIGNATORY

MINNESOTA DEPARTMENT OF TRANSPORTATION

By: _____
Charles A. Zelle, Commissioner

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

INVITED SIGNATORY

CITY OF ROBBINSDALE

By: _____
Marcia Glick, City Manager

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

HENNEPIN COUNTY

By: _____ Date: _____
Kevin Dockry, Director, Community Works and HCRRA, Hennepin County Public Works

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

CITY OF BROOKLYN PARK

By: _____
Jay Strobel, City Manager

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

CITY OF CRYSTAL

By: _____
Anne Norris, City Manager

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

CITY OF GOLDEN VALLEY

By: _____
Tim Cruikshank, City Manager

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

CITY OF MINNEAPOLIS

By: _____
Kjersti Monson, Director, Long Range Planning

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

MINNEAPOLIS HERITAGE PRESERVATION COMMISSION

By: _____
Laura Faucher, Chair

Date: _____

SIGNATURE PAGE

**MEMORANDUM OF AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA HISTORIC PRESERVATION OFFICE
REGARDING
THE METRO BLUE LINE EXTENSION LIGHT RAIL TRANSIT PROJECT
HENNEPIN COUNTY, MINNESOTA**

CONCURRING PARTY

MINNEAPOLIS PARK AND RECREATION BOARD

By: _____ Date: _____
Liz Wielinski, President

And

By: _____ Date: _____
Jennifer Ringold, Secretary to the Board of Commissioners

ATTACHMENT A

Area of Potential Effect

Area of Potential Effect

FTA and MnDOT CRU, in consultation with MnHPO, have defined two Areas of Potential Effect (APEs) for the PROJECT, one for archaeological resources and one for architecture/history properties, that account for potential effects on historic properties from the construction and operation of the PROJECT (Figures 1-10), and MnHPO has concurred.¹

A. The APE for architecture/history resources includes:

- Alignment: all areas within 500 feet on either side of the alignment;
- Stations and the Operations and Maintenance Facility (OMF): all areas within a 0.25 mile radius from the center point of proposed stations and the OMF;
- New structures (new or replacement bridges, pedestrian bridges, etc.): all areas within a 0.25 mile radius from the structure (assumes the potential for pile driving);
- Modifications to existing structures (widening/reconstruction of existing structures): all areas within a 0.25 mile radius from the structure (assumes the potential for pile driving); and
- Pier modifications on existing structures (moving piers to allow the LRT to go under): all areas within a 500 feet radius from the structure (assumes using drilling and no pile driving).

B. The APE for archaeological resources includes all areas of proposed construction activities or other potential ground disturbing activities associated with construction.² Based on the current understanding of the proposed project, the archaeological APE generally includes:

- Alignment: the existing railroad right-of-way for portions of the PROJECT in an existing railroad corridor and the potential area of disturbance for other areas;

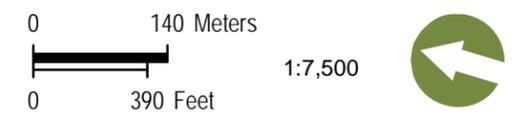
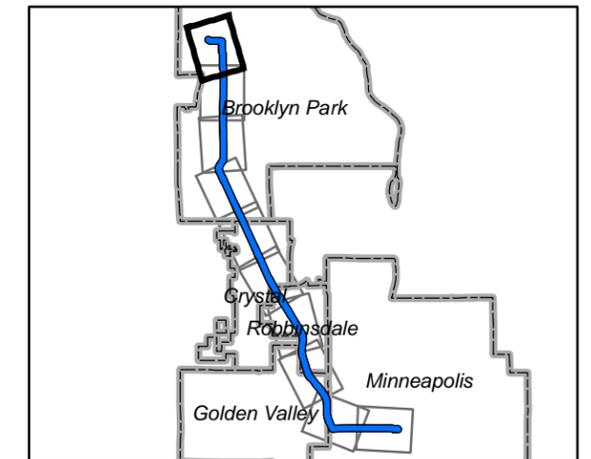
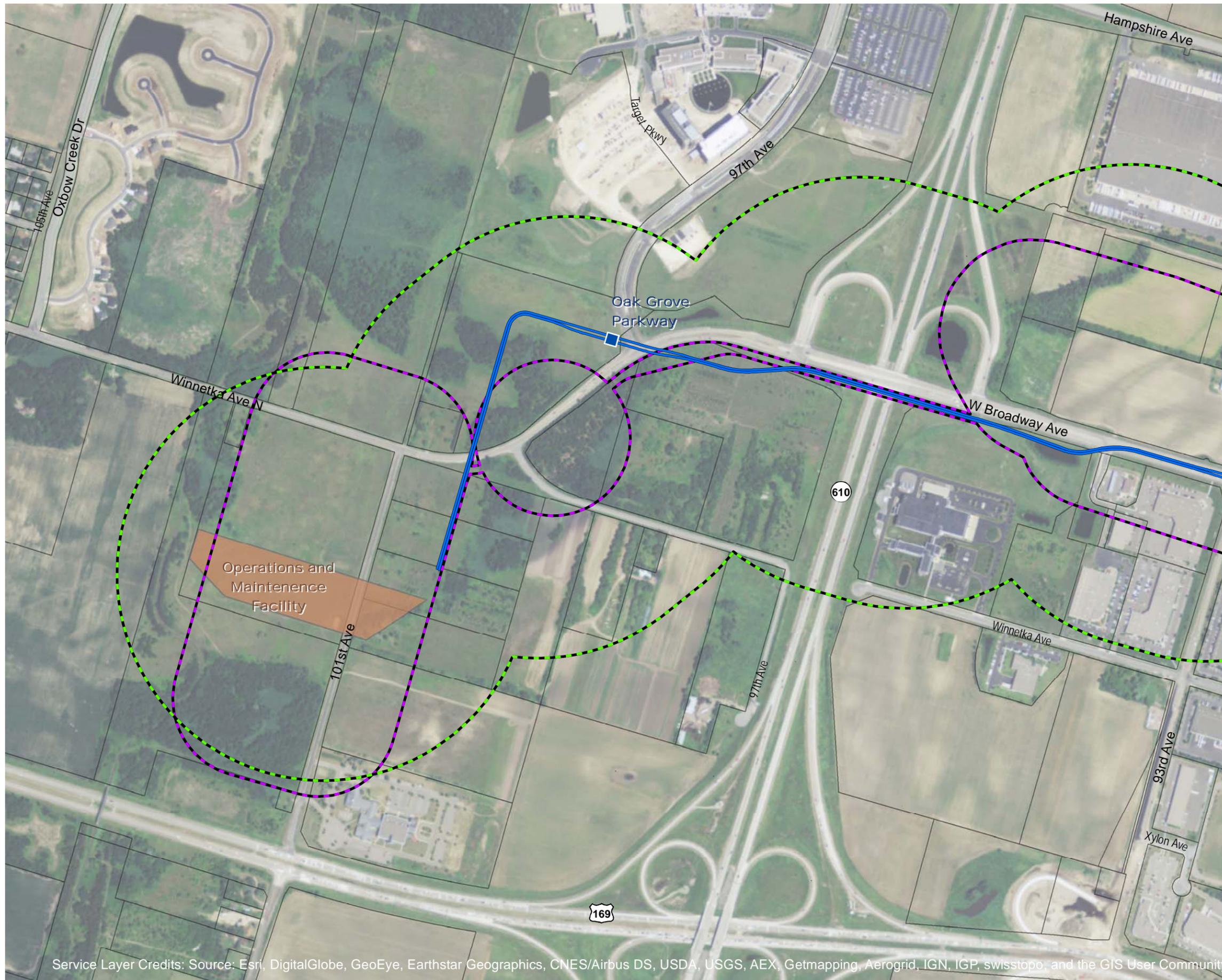
¹ Letter from MnHPO to MnDOT CRU dated October 26, 2011. The APE that MnHPO concurred with included the entirety of the Locally Preferred Alternative (LPA), as well as various alternative alignments that were under consideration at the time the APE was established. These alternative alignments were considered during the development of the Draft EIS, but were not selected as part of the LPA and have been dropped from further consideration. Therefore, they are not depicted in Figures 1-10.

² Figures 1-10 depict the location of the LPA and the corresponding archaeological APE. As the Project design has advanced since the archaeological APE was established, there have been several slight revisions to the Project design, but not to the Project scope. As a result, as is depicted in Figures 1-10, there are several small portions of the LPA that are now located outside the existing archaeological APE. However, the Phase IA archaeological investigation conducted for the Project studied an area extending 0.25 miles beyond the archaeological APE, so the portions of the current LPA that are located outside the archaeological APE have been studied. No historic properties were identified and these areas were found to have low potential for archaeological resources to exist. The portion of the LPA outside the APE, from and including the 93rd Avenue station and its park-and-ride facility to the OMF site (see Figure 1), also were previously surveyed at a Phase I level for another project and no historic properties were identified (see Woodward-Clyde, 1994). MnDOT CRU also examined the portions of the LPA outside the present APE again on January 12, 2016 through the use of its Minnesota Model (MnModel) and confirmed these areas have low archaeological site potential. Based on the previous archaeological assessments completed for the Project, the 1994 survey by Woodward-Clyde, and MnModel data, FTA has determined there is low potential for archaeological resources to exist, but will incorporate measures covering unanticipated discoveries during construction in its Section 106 MOA for the Project.

- Stations: all areas within a 500 feet radius from the center point of the currently proposed station platforms to account for potential direct impacts from construction or development activities; and
- Park-and-ride facilities and the OMF: all areas within 500 feet from the potential area of disturbance.

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

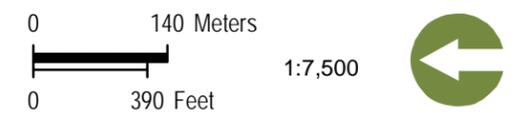
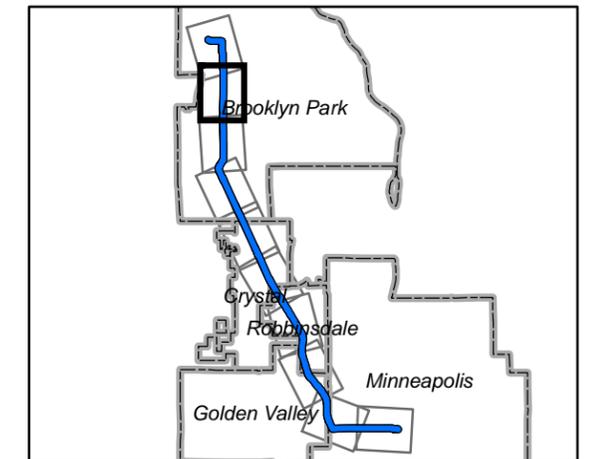
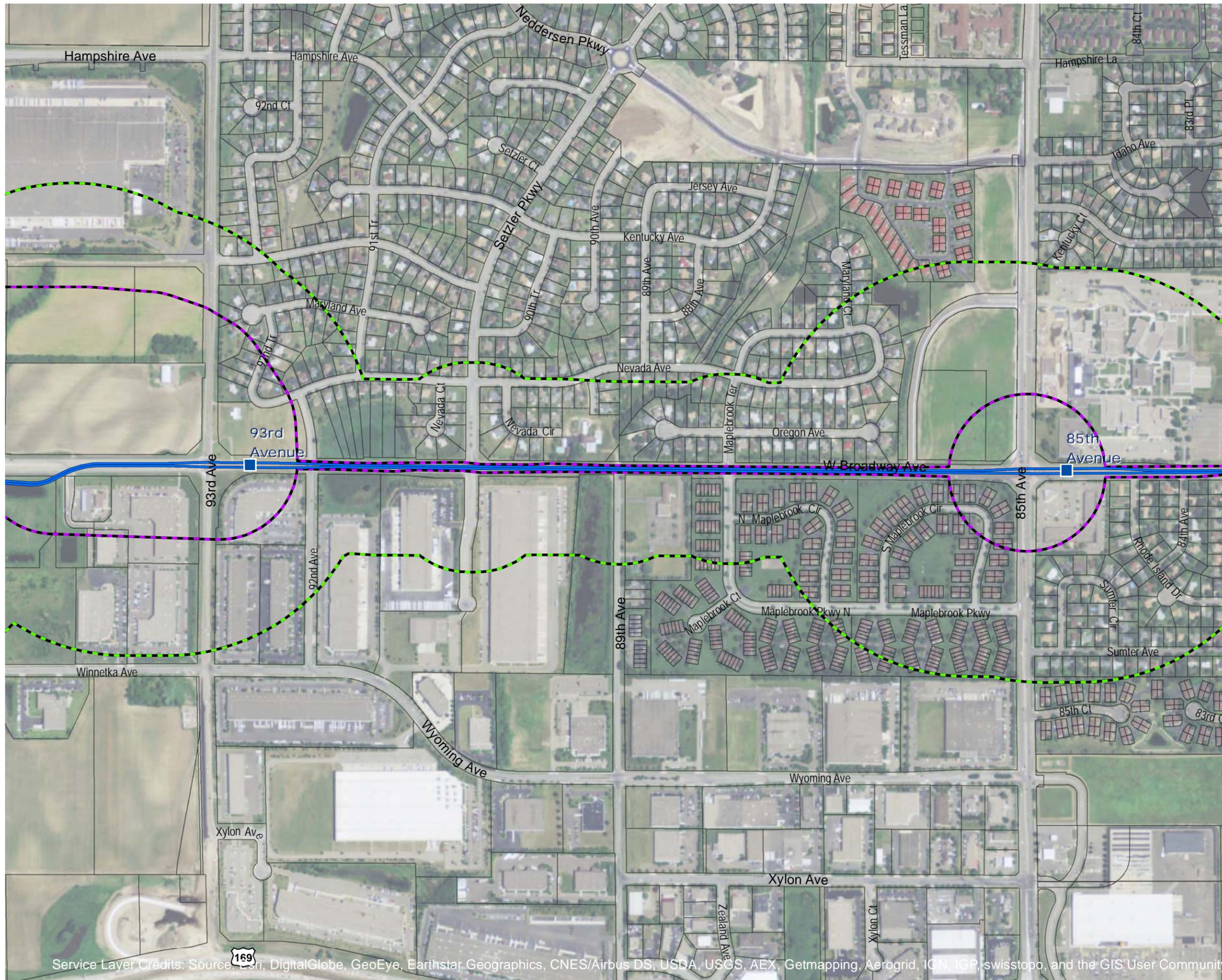
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 1

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



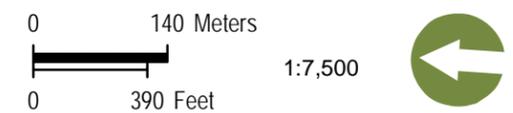
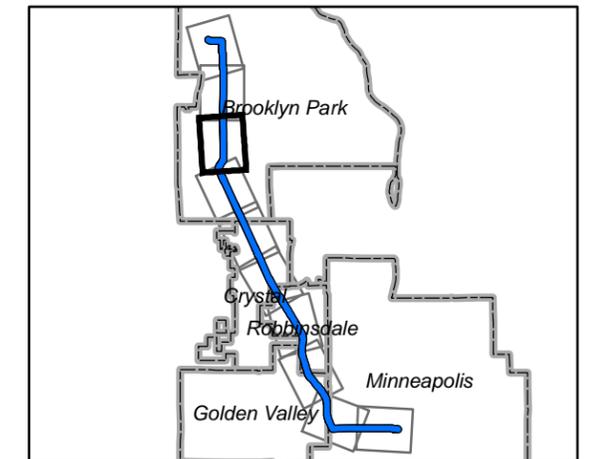
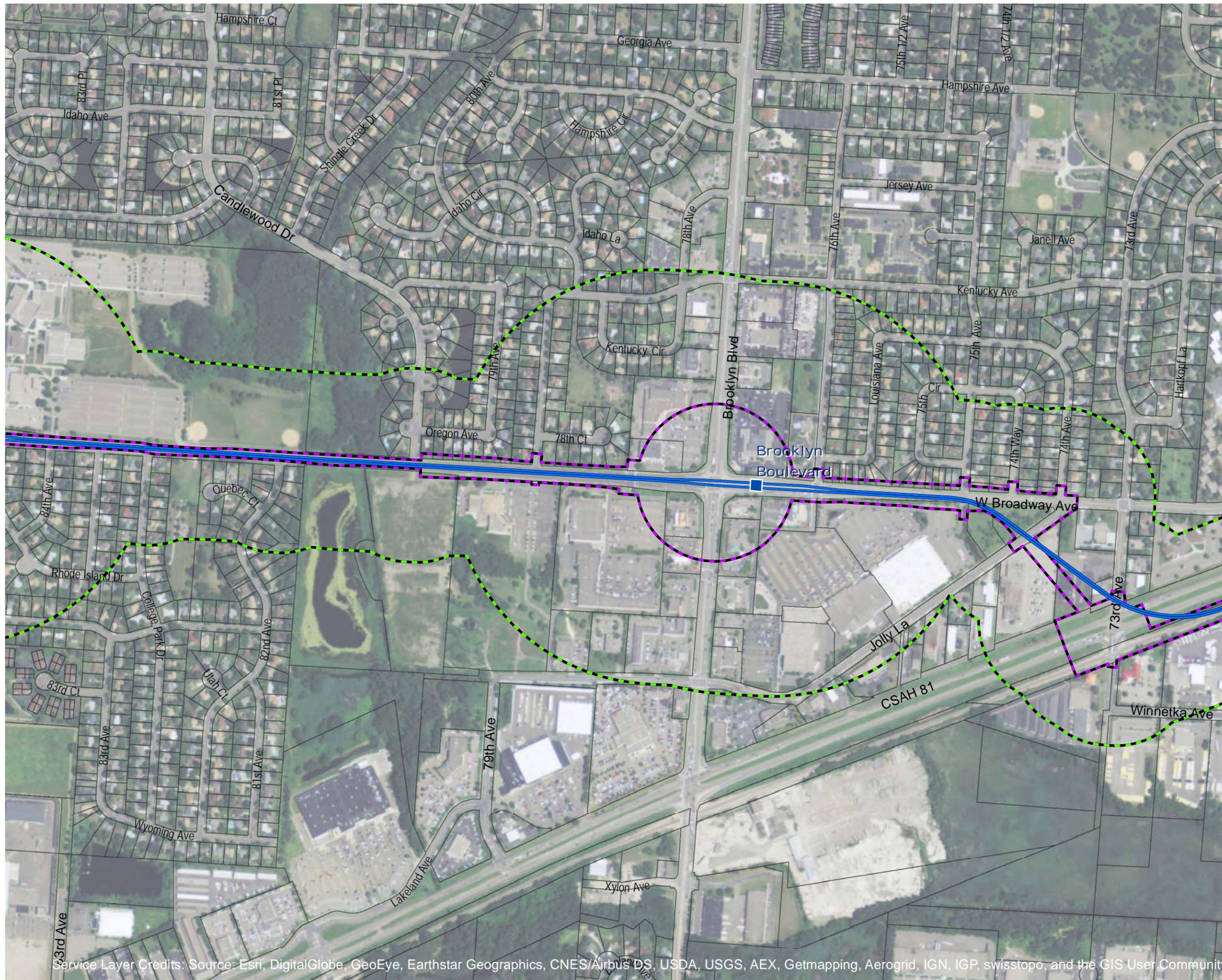
APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Figure 2

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

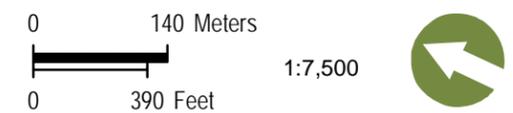
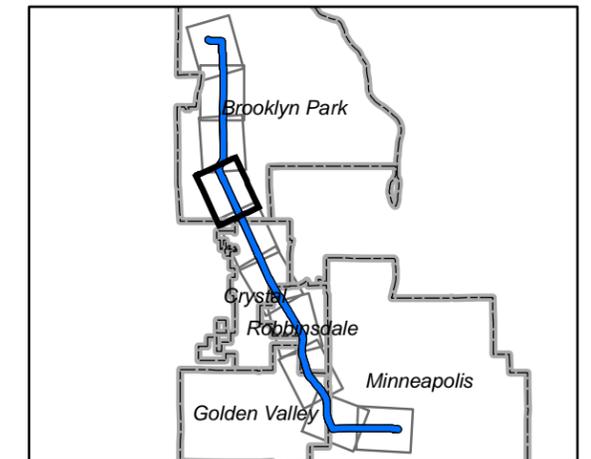
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 3

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

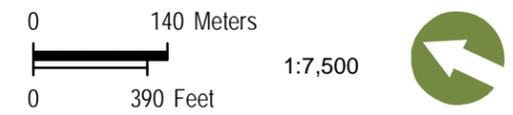
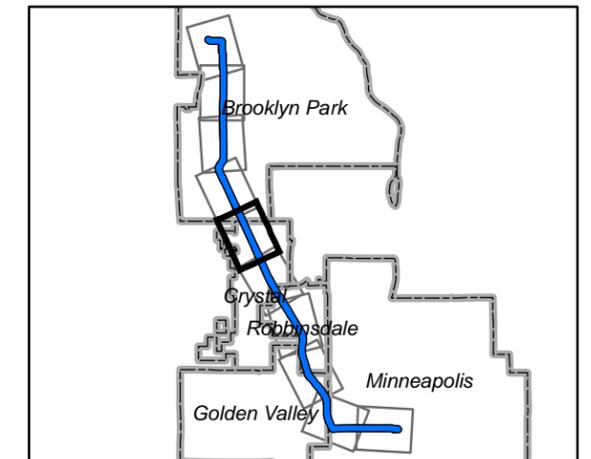
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 4

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment

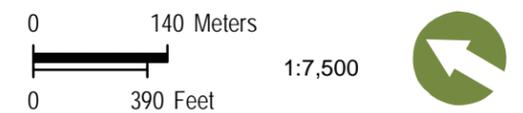
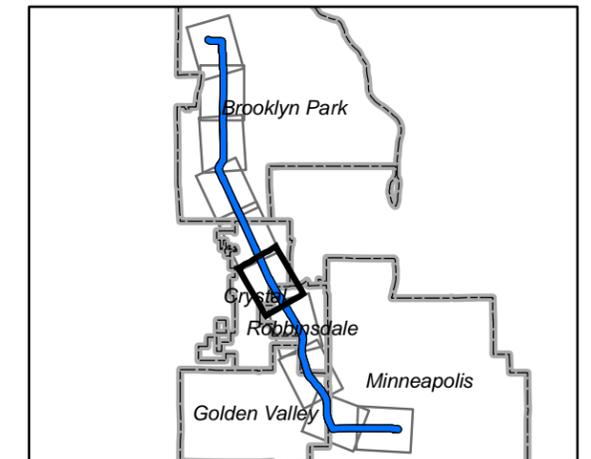


APE: Archaeology & Architecture/History

Figure 5

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

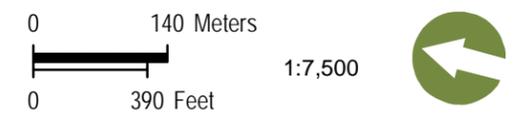
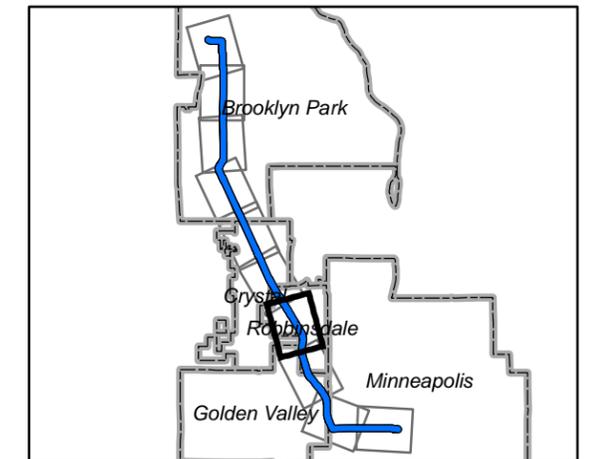
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 6

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

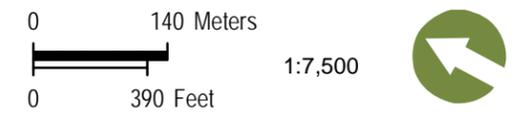
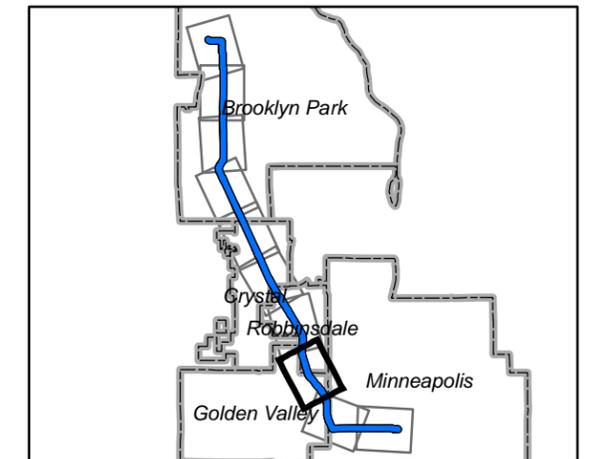
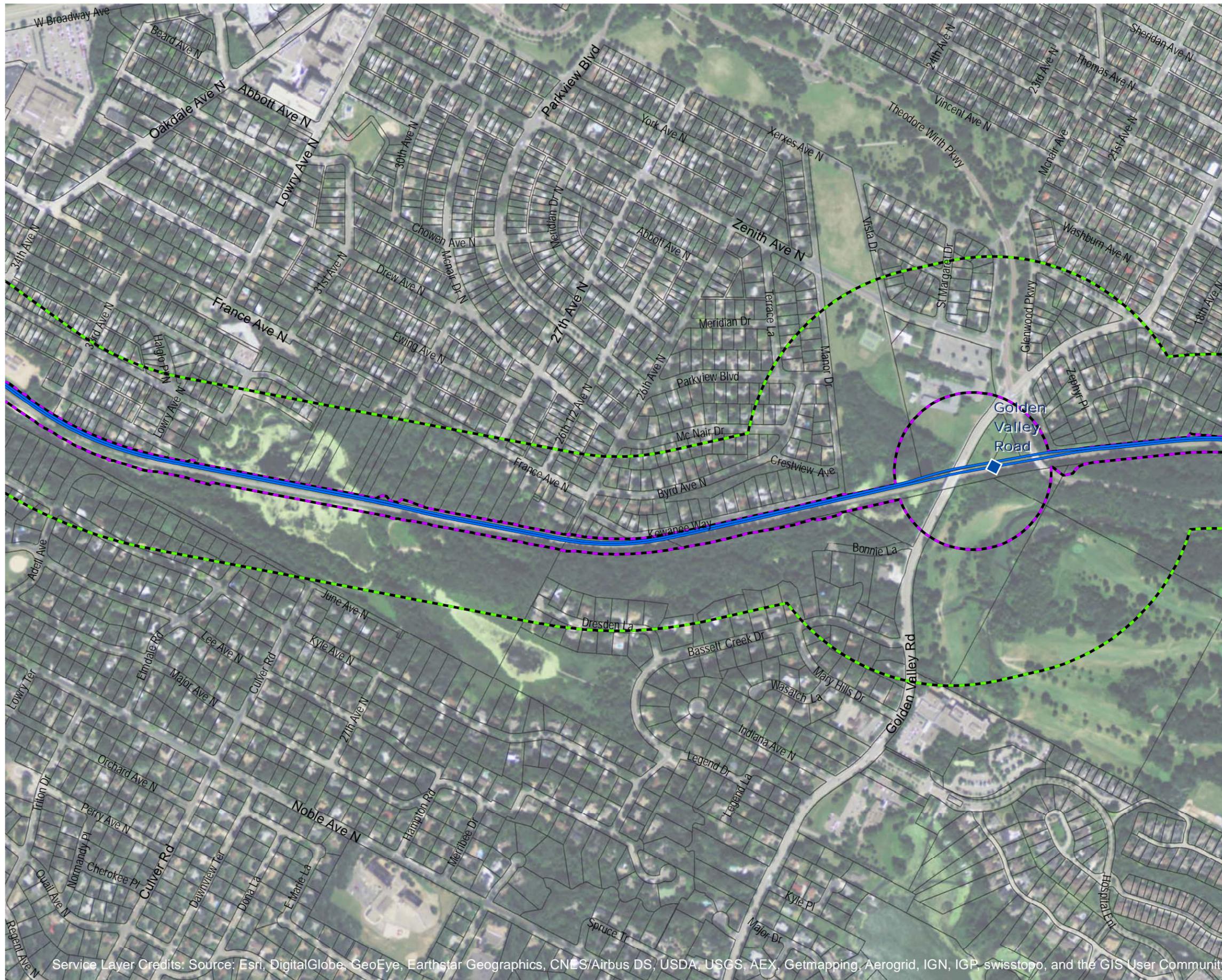
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 7

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

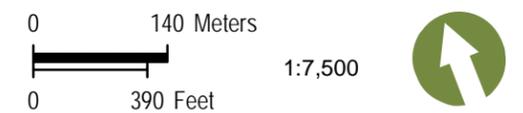
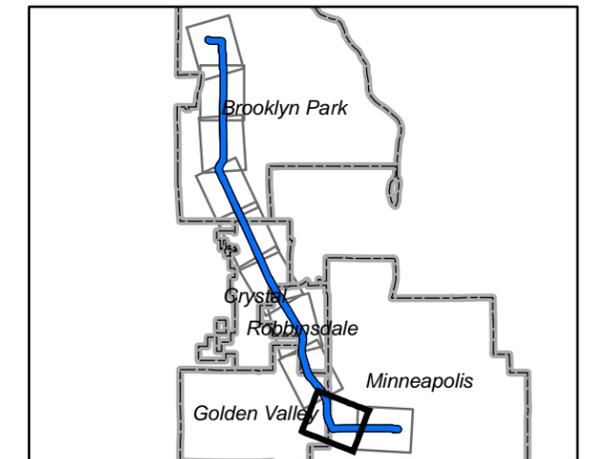
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 8

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

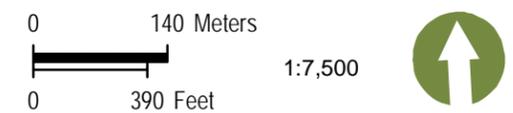
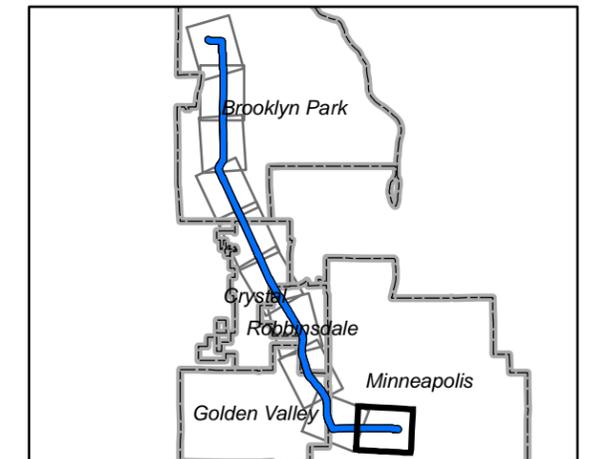
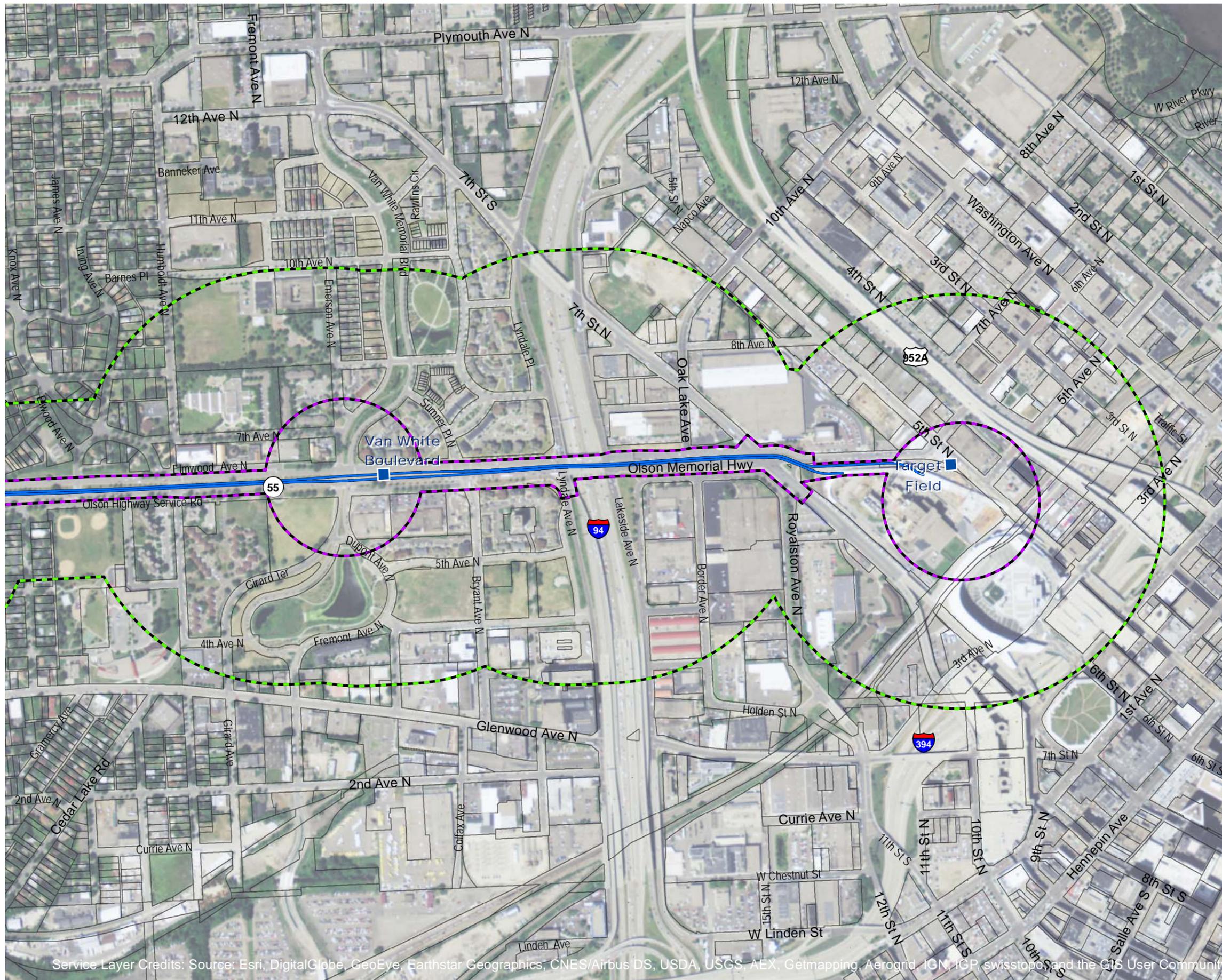
Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 9

Blue Line Extension LRT
FEIS
Hennepin County, Minnesota

-  Archaeology Area of Potential Effect
-  Architecture/History Area of Potential Effect
-  BLRT Alignment



APE: Archaeology & Architecture/History

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Source: HDR; Kimley Horn; MnDOT; 106 Group

Map Produced by 106 Group 3/31/2016

Figure 10

ATTACHMENT B

Properties Listed in and Determined Eligible for Listing in the National Register of Historic Places

Properties Listed in and Determined Eligible for Listing in the National Register of Historic Places

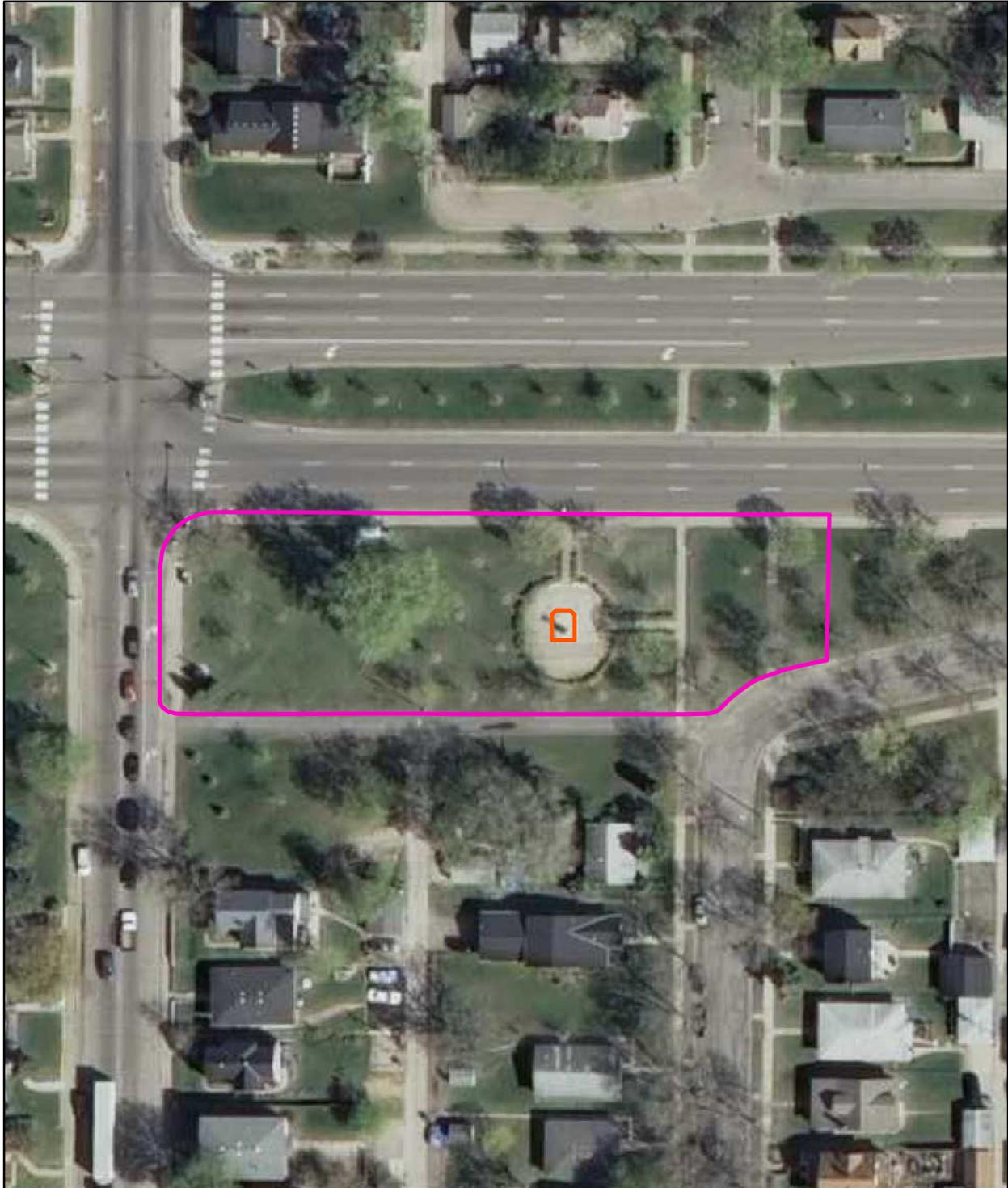
Inventory No.	Property Name	Address	City	NRHP Status	
				Indiv.	Hist. Dist.
	<i>Historic Districts</i>				
XX-RRD-002, includes: HE-MPC-16389 HE-RBC-304 HE-CRC-0238 HE-BPC-0084	Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District	—	Minneapolis, Golden Valley, Robbinsdale, Crystal, Brooklyn Park	—	Eligible
XX-RRD-010	St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District	—	Minneapolis	—	Eligible
HE-MPC-0441	Minneapolis Warehouse Historic District	Vicinity of 1 st Ave. N., N. 1 st . St., 10 th Ave. N., & N. 6 th St.	Minneapolis	—	Listed
HE-MPC-12101	Homewood Residential Historic District	Bounded by Penn Ave. N., Oak Park Ave., Xerxes Ave. N., & Plymouth Ave.	Minneapolis	—	Eligible
HE-CRC-199	Minneapolis & Pacific Rwy. / Soo Line Rwy. Historic District	—	Crystal	—	Eligible
HE-RBC-158	West Broadway Avenue Residential Historic District	W. Broadway Ave. between 42 nd Ave. N. and TH 100 & Lakeland Ave. between 42½ Ave. N. & 43 rd Ave. N.	Robbinsdale	—	Eligible
XX-PRK-001	Grand Rounds Historic District (GRHD)	—	Minneapolis, Golden Valley ⁵	—	Eligible
	<i>Individual Resources</i>				
HE-GVC-0050	Bridge No. L9327	Theodore Wirth Pkwy. over Bassett's Creek	Golden Valley	Eligible	Eligible (GRHD)
HE-MPC-7553	Labor Lyceum	1800 Olson Memorial Hwy. (TH 55)	Minneapolis	Eligible	—
HE-MPC-8081	Sumner Branch Library	611 Emerson Ave. N.	Minneapolis	Listed	—
HE-MPC-8125	Northwestern Knitting Company Factory	718 Glenwood Ave.	Minneapolis	Listed	—
HE-MPC-8290	Wayman A.M.E. Church	1221 7 th Ave. N.	Minneapolis	Eligible	—
HE-MPC-9013	Floyd B. Olson Memorial Statue	Olson Memorial Highway (TH 55) at Penn Ave. N.	Minneapolis	Eligible	—
HE-RBC-024	Hennepin County Library, Robbinsdale Branch	4915 42 nd Ave. N.	Robbinsdale	Listed	—
HE-RBC-264	Jones-Osterhus Barn	4510 Scott Ave. N.	Robbinsdale	Eligible	—
HE-RBC-286	Robbinsdale Waterworks	4127 Hubbard Ave. N.	Robbinsdale	Eligible	—
HE-RBC-1462	Sacred Heart Catholic Church	4087 W. Broadway Ave.	Robbinsdale	Eligible	—

⁵ Cities listed only for portions of GRHD in the APE

ATTACHMENT C

Floyd B. Olson Memorial National Register of Historic Places Boundary and Setting

Floyd B. Olson Memorial NRHP Boundary



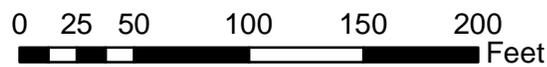
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CULTURAL RESOURCES UNIT

Legend

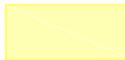
-  NRHP Boundary (2016)
-  NRHP Boundary (old)



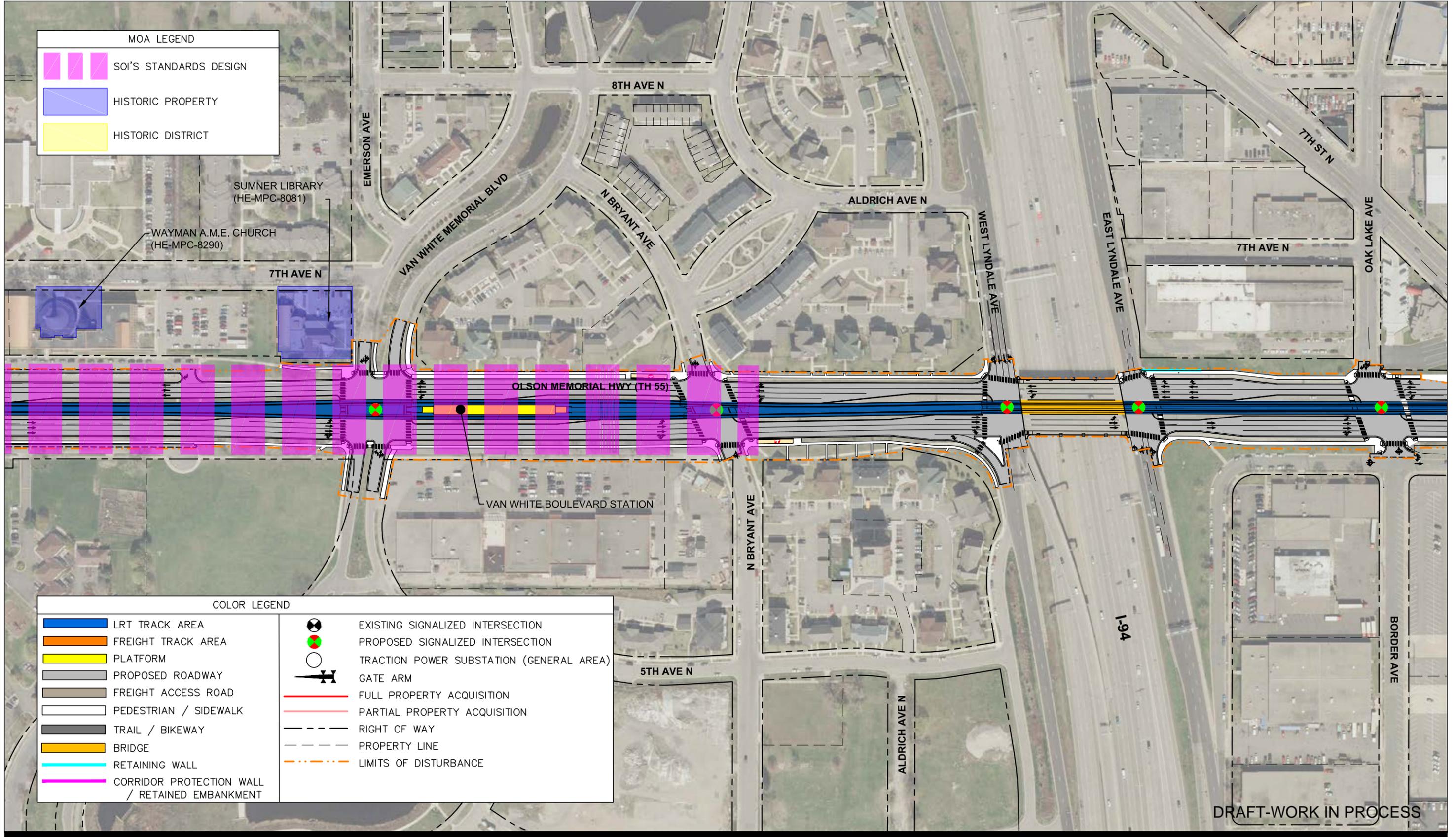
ATTACHMENT D

**Project Segments to be Designed in Accordance with the Secretary of the Interior's Standards for
the Treatment of Historic Properties**

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	HISTORIC PROPERTY
	HISTORIC DISTRICT

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	FREIGHT TRACK AREA		PROPOSED SIGNALIZED INTERSECTION
	PLATFORM		TRACTION POWER SUBSTATION (GENERAL AREA)
	PROPOSED ROADWAY		GATE ARM
	FREIGHT ACCESS ROAD		FULL PROPERTY ACQUISITION
	PEDESTRIAN / SIDEWALK		PARTIAL PROPERTY ACQUISITION
	TRAIL / BIKEWAY		RIGHT OF WAY
	BRIDGE		PROPERTY LINE
	RETAINING WALL		LIMITS OF DISTURBANCE
	CORRIDOR PROTECTION WALL / RETAINED EMBANKMENT		



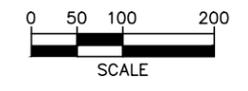
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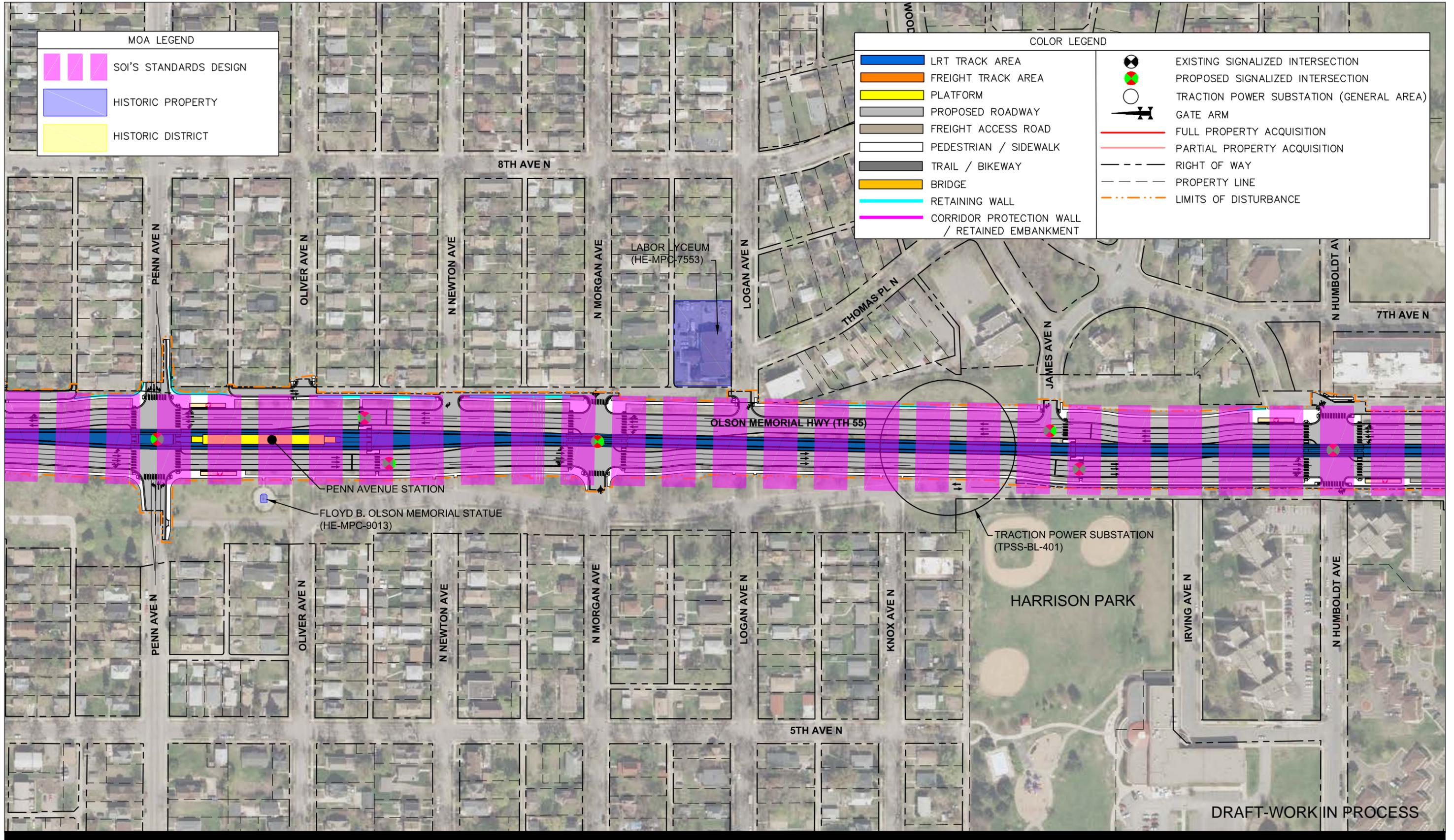
Kimley»Horn

BLUE LINE LRT EXTENSION

CITY OF MINNEAPOLIS
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



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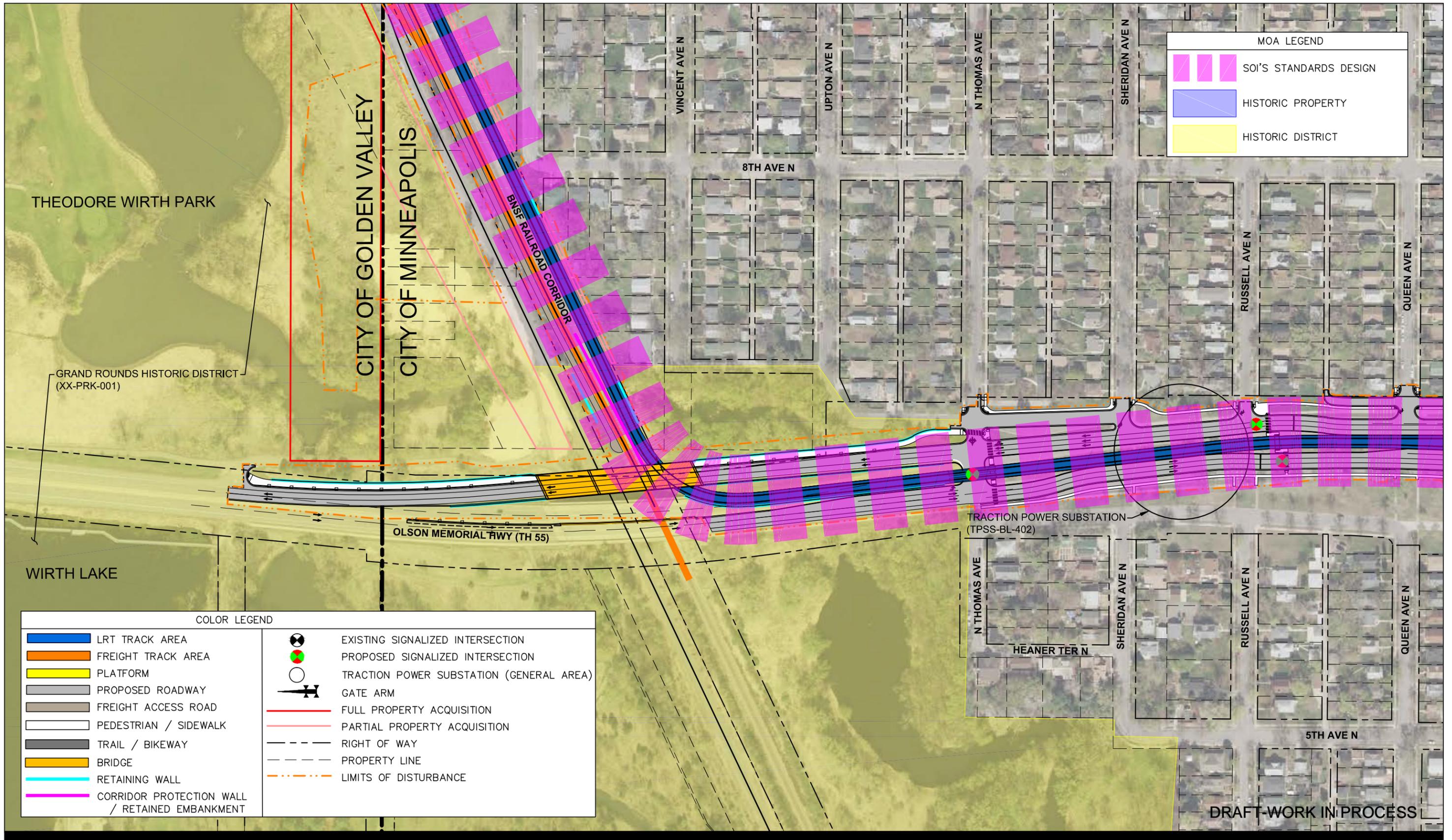
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BLUE LINE LRT EXTENSION

CITY OF MINNEAPOLIS
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



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DRAFT WORK IN PROCESS



Kimley»Horn

BLUE LINE LRT EXTENSION

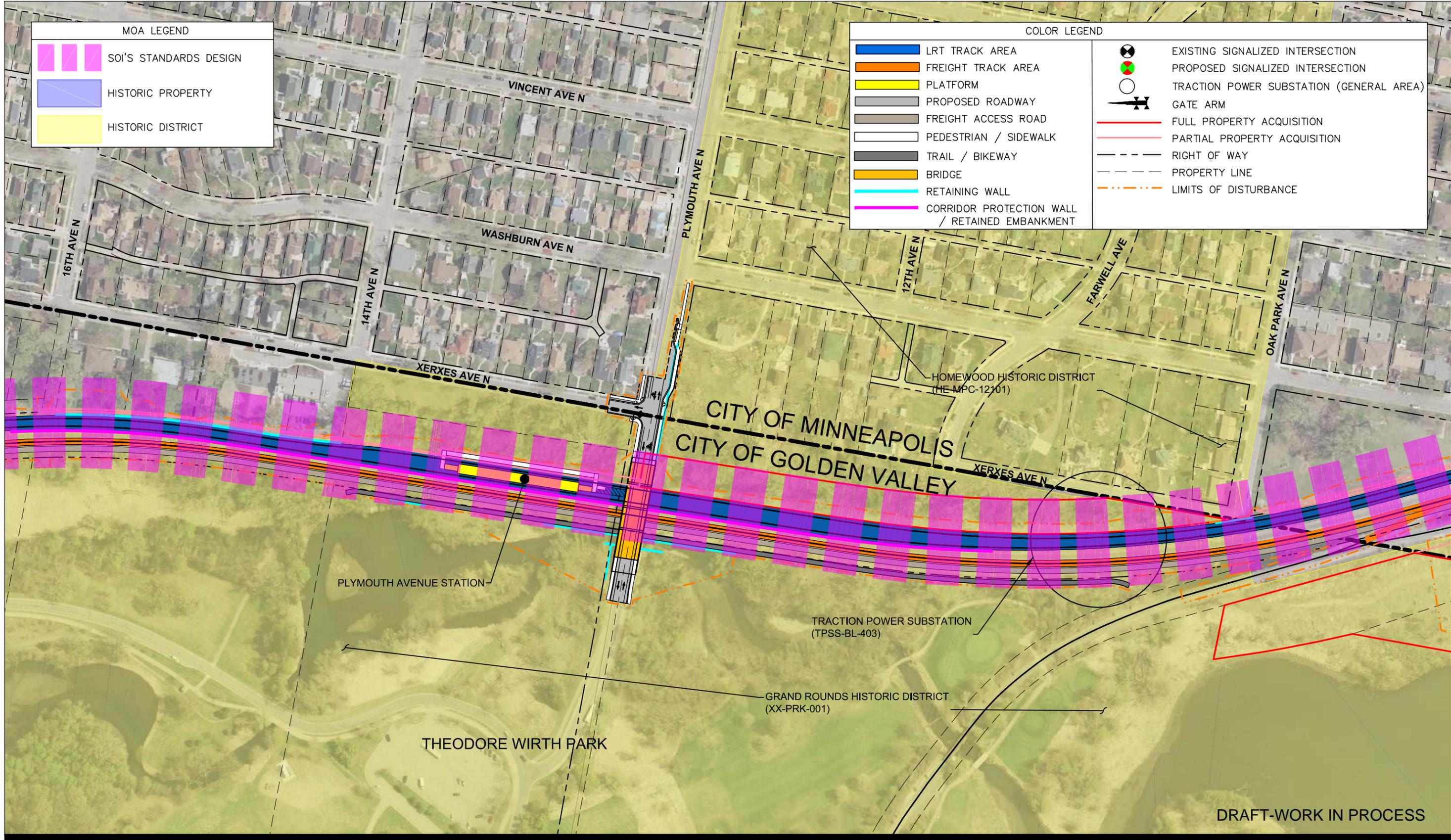
CITY OF MINNEAPOLIS
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



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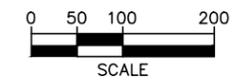
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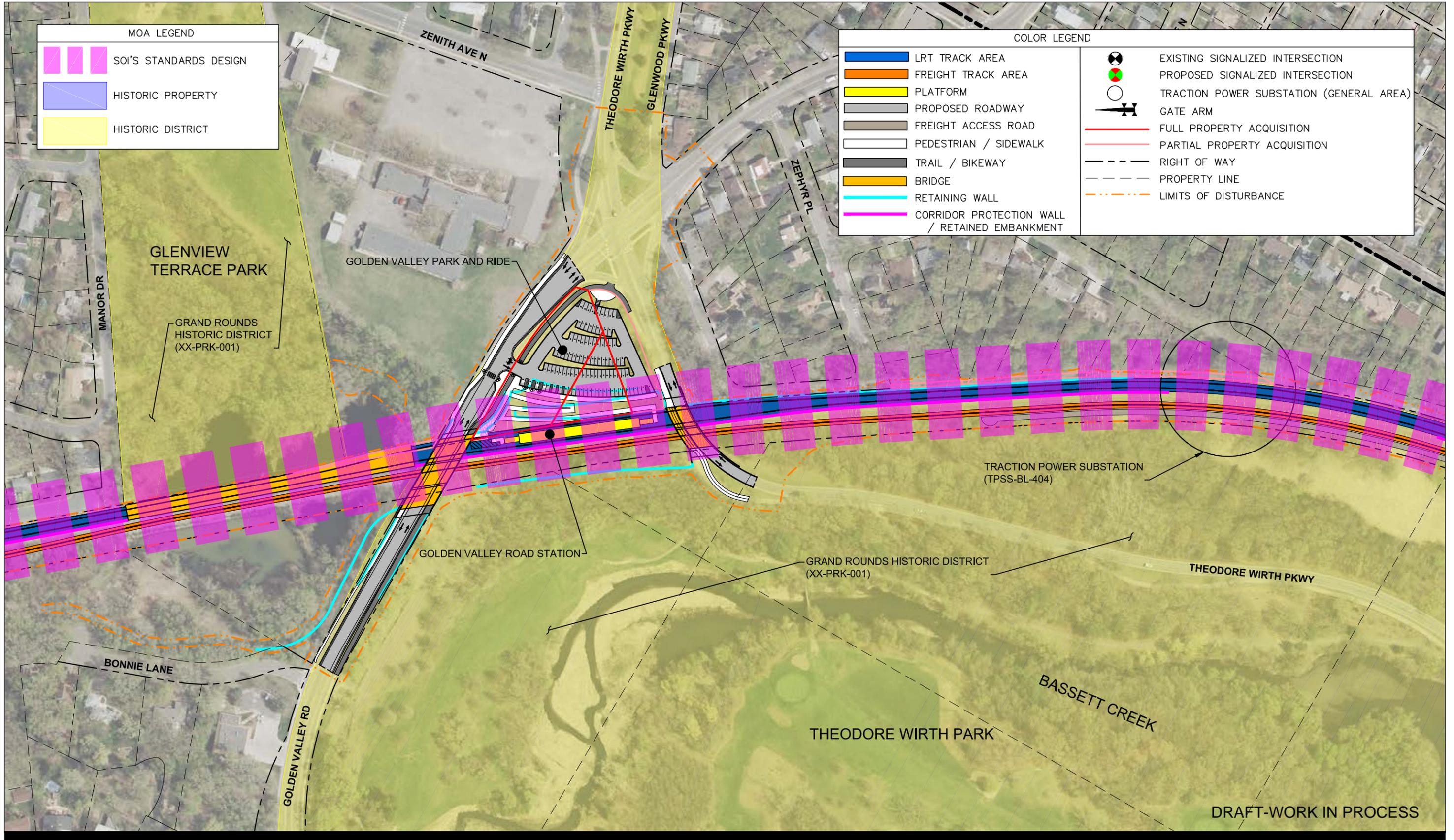
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BLUE LINE LRT EXTENSION

CITY OF GOLDEN VALLEY
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



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	TRACTION POWER SUBSTATION (GENERAL AREA)
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	LIMITS OF DISTURBANCE

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BLUE LINE LRT EXTENSION

CITY OF GOLDEN VALLEY
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
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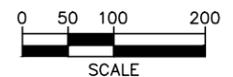
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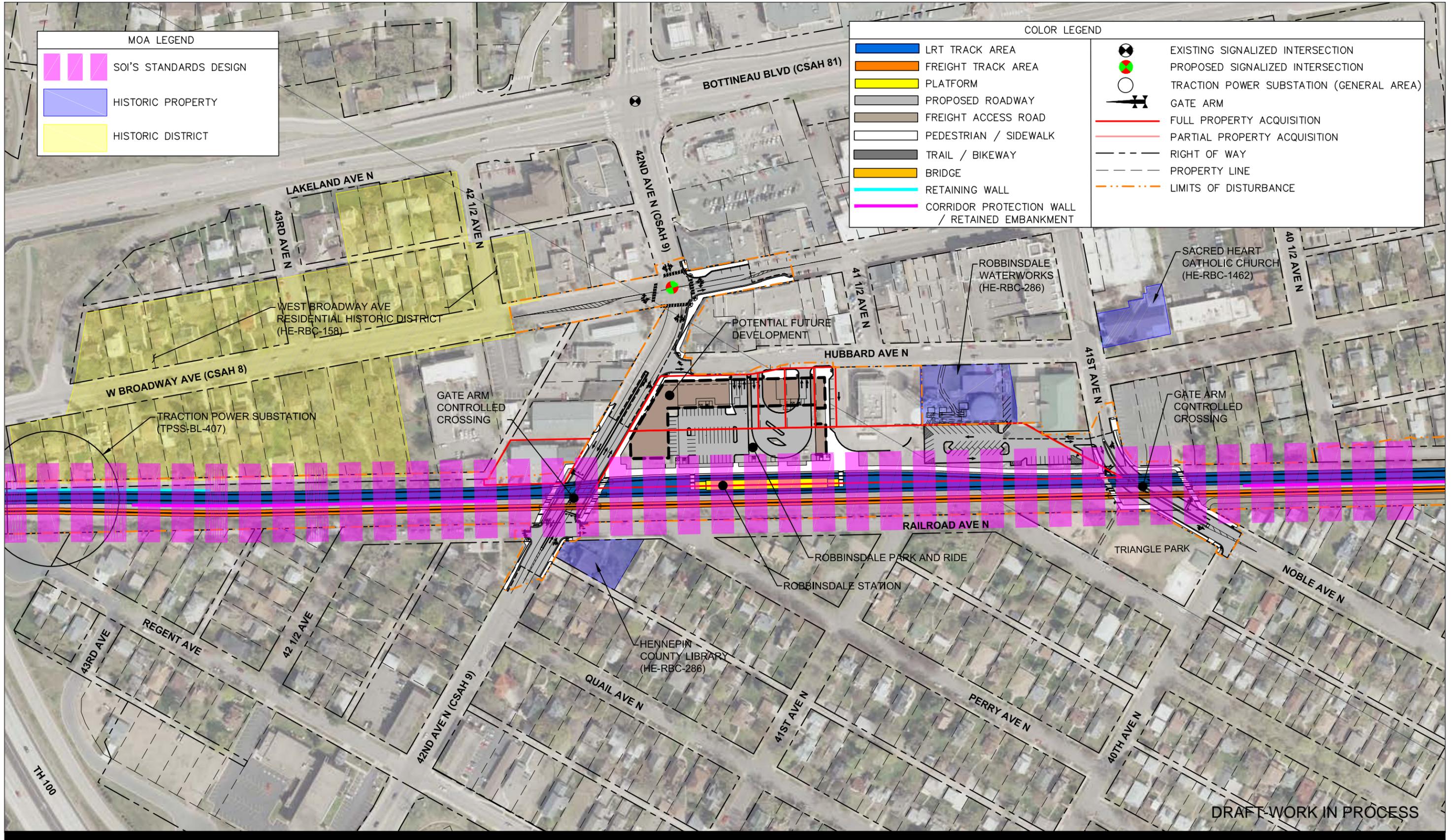
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BLUE LINE LRT EXTENSION

CITY OF GOLDEN VALLEY
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



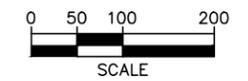
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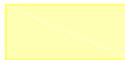
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BLUE LINE LRT EXTENSION

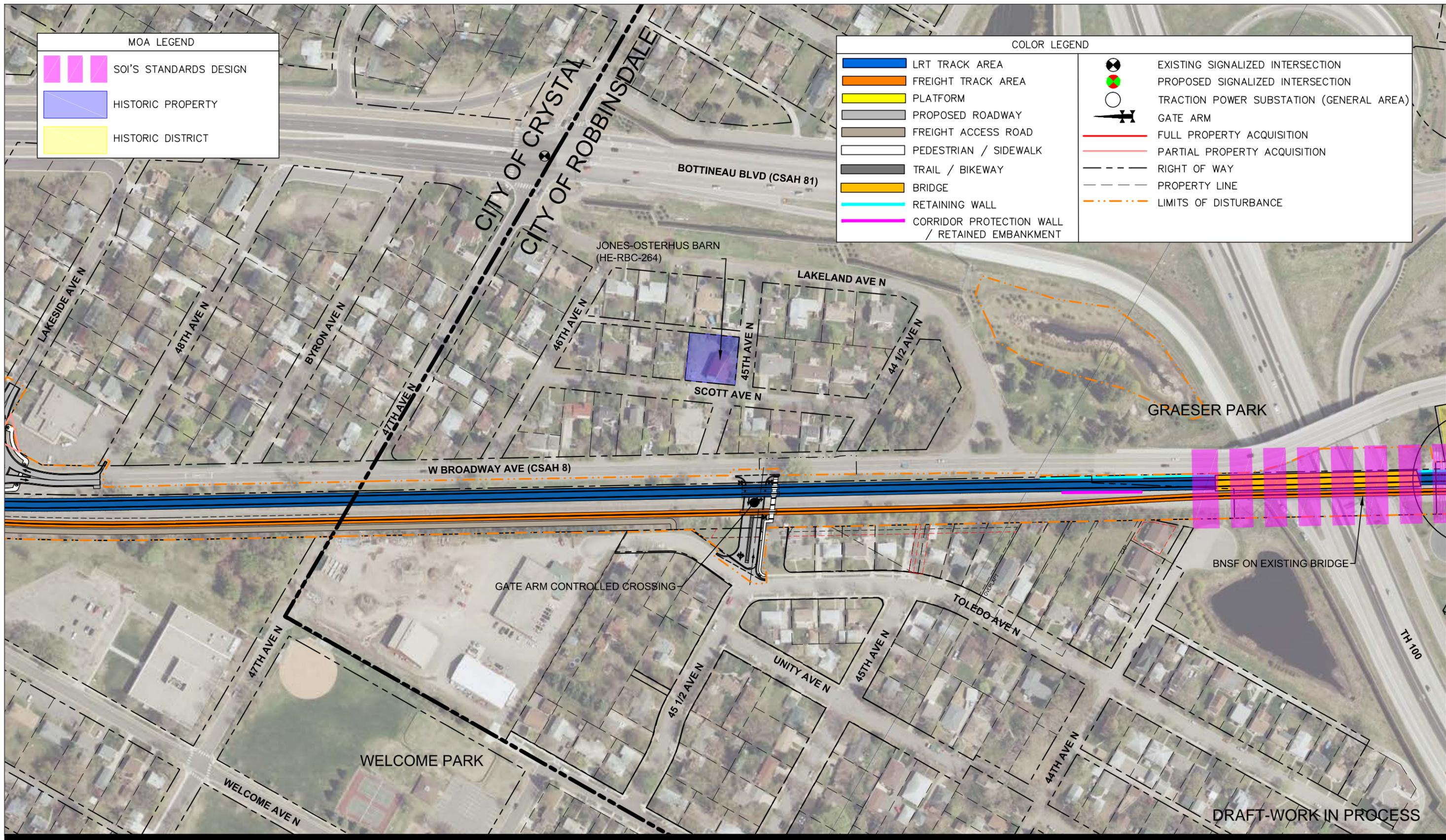
CITY OF ROBBINSDALE
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



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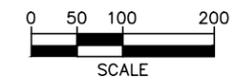


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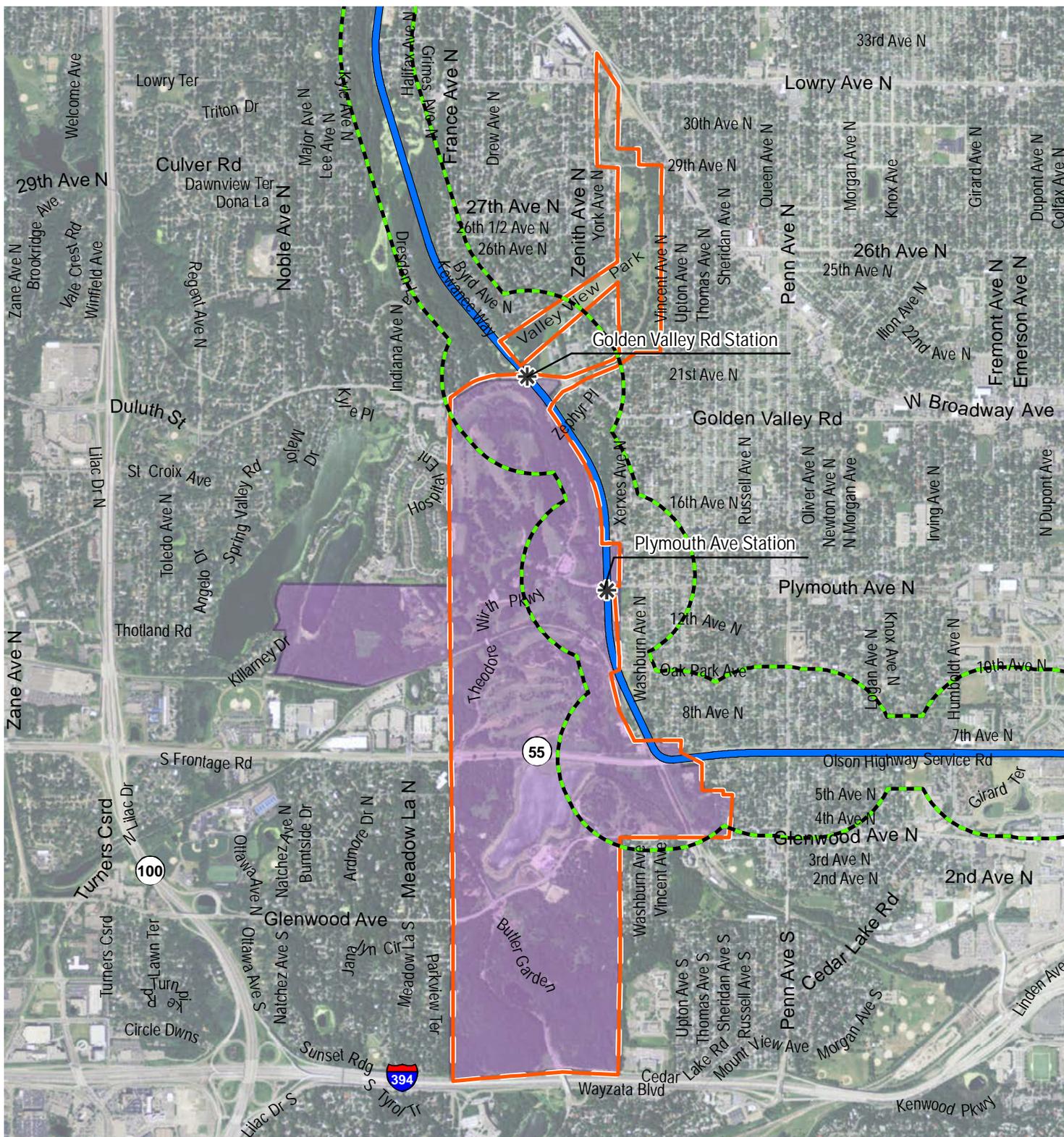
BLUE LINE LRT EXTENSION

CITY OF ROBBINSDALE
PROJECT ELEMENTS TO BE DESIGNED TO SOI'S STANDARDS
ATTACHMENT D



ATTACHMENT E

Grand Rounds Historic: Theodore Wirth Segment Plans Study Area Limits



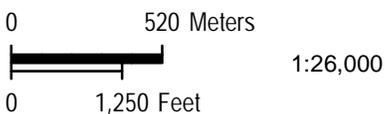
Source: MNDOT; Hennepin County; City of Minneapolis; 106 Group

Map Produced by 106 Group 4/4/2016

Blue Line Extension LRT (BLRT)
 Section 106
 Memorandum of Agreement
Minneapolis and Golden Valley, Minnesota

Grand Rounds Historic District
 Theodore Wirth Segment

- Proposed Alignment
- ✱ Proposed Station
- Architecture/History Area of Potential Effect
- Grand Rounds Historic District - Theodore Wirth Segment*
- Current Theodore Wirth Park Area



* The Grand Rounds Historic District boundary for the Theodore Wirth Segment reflects the currently documented period of significance to 1942. The boundary for the potential extended period of significance to 1975 may vary.

ATTACHMENT F

Minneapolis Park and Recreation Board Code of Ordinances, Chapter 11

Chapter 11 - PARK FACILITY CONSTRUCTION AND REDEVELOPMENT - COMMUNITY ENGAGEMENT^[13]

Footnotes:

--- (13) ---

Editor's note—Pk. Bd. Ord. No. 2011-103, § 1, adopted November 9, 2011, amended the title of Ch. 11 to read as herein set out. Prior to inclusion of said ordinance, Ch. 11 was titled, "Park Facility Construction and Redevelopment Public Participation."

PB11-1. - Definitions.

As used in this chapter the following terms shall mean:

Community Engagement: The opportunity for stakeholders to influence decisions that shape the park system, including the intentional effort to create public understanding of MPRB project, programs, and services, and to make certain the MPRB is aware of and responsive to stakeholder needs, concerns and industry trends. Interchangeable terms include: public participation, community involvement, and citizen participation.

Park facility construction and redevelopment: The development of new or redevelopment of existing facilities as approved and budgeted in a Capital Improvement Program for the Minneapolis Park and Recreation Board, including construction and redevelopment of facilities approved and budgeted through third party agreement. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-2. - Community Engagement Policy.

The Minneapolis Park and Recreation Board shall create, maintain, and regularly evaluate a community engagement policy that requires all park facility construction and redevelopment projects to have a community engagement plan. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-3. - Community Engagement Plan.

All park facility construction and redevelopment projects require a community engagement plan. The community engagement plan shall be developed in consultation with established neighborhood organizations. When possible, other representative community groups and under-represented groups shall be involved in the development of the plan. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-4. - Community Advisory Committee—Creation and Authority.

The Minneapolis Park and Recreation Board shall cause a community advisory committee to be created when recommended within a community engagement plan. The community advisory committee shall be balanced and representative of the interests impacted by the proposed park facility construction or redevelopment project. The community advisory committee shall have the authority to make recommendations to the designated Committee of the Board on the proposed park facility construction and redevelopment project. The Board of Commissioners shall have the authority to cause the creation

and approve the charge and composition of a community advisory committee for topics of its choosing. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-5. - Community Advisory Committee—Meetings and Recommendation.

All meetings shall be open to the public. Any person may appear and speak at a meeting either in person or by a duly appointed representative. Upon conclusion of public input, the community advisory committee shall announce its recommendation or shall lay the proposal over to a subsequent meeting. Records shall be kept on file at the Park Board office of attendance, meetings, agendas, handouts and committee actions. All recommendations of the community advisory committee shall be presented at the public hearing of the designated Committee of the Board. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-6. - Committee of the Board Public Hearing.

A Committee of the Board shall hold a public hearing on all project that include recommendations of a community advisory committee. The chair or acting chair may set the parameters of testimony to be received from interested parties. Any person may appear and testify at a hearing either in person or by a duly appointed representative. After reviewing the community advisory committee's recommendations and after the conclusion of public testimony, the Committee of the Board shall announce its decision or shall lay the matter over to a subsequent meeting. The Committee of the Board shall keep records of its public hearing and official actions. Decisions of the Committee of the Board shall be dated and forwarded to the full Board. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-7. - Community Advisory Committee Meeting and Public Hearing Notice.

The Minneapolis Park and Recreation Board shall create and maintain a notification process that addresses all community advisory committee meetings and public hearings for a project. This process shall require a ten (10) day notice of the first meeting in a newspaper of general circulation, of park councils and registered neighborhood groups and all owners of records of property located in whole or in part within three (3) city blocks of the project area. The notice shall comply with all other notice requirements of Minnesota's Open Meeting Law. Failure to give mailed notice to all affected parties, or defects in the notice, shall not invalidate the process or proceedings. (Pk. Bd. Ord. No. 99-1010, § 1, 9-15-99 ; Pk. Bd. Ord. No. 2011-103, § 1, 11-9-11)

PB11-8, PB11-9. - Reserved.

Editor's note— Pk. Bd. Ord. No. 2011-103, § 1, adopted November 9, 2011, repealed §§ PB11-8, PB11-9, which pertained to Full Park Board Hearing Notice and Public Hearing of Appeal. See also the Park Board Comparative Table.



Appendix H

Section 106 Supporting Materials

H.2 Section 106 Agency Correspondence

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



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Minnesota Department of Transportation

Office of Environmental Stewardship

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

Office Tel: (651) 366-4292

Fax: (651) 366-3603

11 March 2014

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

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

Dear Ms. Beimers:

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

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

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

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

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

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

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

Phase I forms for the other five features are enclosed:

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

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

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

Sincerely,



Dennis Gimmestad
MnDOT Cultural Resources Unit

cc (via email):

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

STATE HISTORIC PRESERVATION OFFICE

April 11, 2014

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

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

Dear Mr. Gimmestad:

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

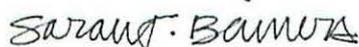
Thank you for submitting the Phase I inventory forms for the five (5) features located within, but not listed as contributing elements to, the Grand Rounds Historic District:

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

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

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

Sincerely,



Sarah J. Beimers
Manager, Government Programs & Compliance



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

MAR 30 2015

REPLY TO
ATTENTION OF

Operations - Regulatory (2012-01051-MMJ)

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

Dear Ms. Simon:

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

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

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

Sincerely,

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

Tamara E. Cameron
Chief, Regulatory Branch

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



Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

Office Tel: (651) 366-4292

Fax: (651) 366-3603

greg.mathis@state.mn.us

July 10, 2015

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

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

Dear Ms. Beimers,

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

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

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

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

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

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

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

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

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

Please find attached the following materials for your review:

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

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

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

Sincerely,



Greg Mathis
MnDOT Cultural Resources Unit

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



City of Robbinsdale

4100 Lakeview Avenue North • Robbinsdale • Minnesota • 55422-2280
Phone (763)531-1258 • Fax (763)531-1291
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August 7, 2015

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

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

Dear Mr. Mathis,

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

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

Our review is as follows:

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

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

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

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

Greg Mathis
August 7, 2015
Page 2

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

Osseo Branch Line railroad – no comments to add.

You can reach me at 763-531-1258 during business hours or email mglick@ci.robbinsdale.mn.us

Sincerely,

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

Marcia Glick
Robbinsdale City Manager



7800 Golden Valley Road
Golden Valley, MN 55427

August 10, 2015

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

Mr. Mathis,

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

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

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

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

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

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

Sincerely,

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

Emily Goellner
Associate Planner/Grant Writer

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

August 10, 2015

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

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

Dear Mr. Mathis,

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

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

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

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

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

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

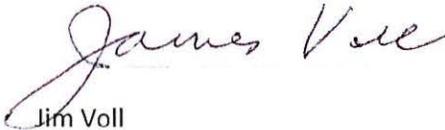
CPED-Long Range Planning agrees with the identification of indirect effects for the following properties:

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

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

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

Sincerely,



Jim Voll

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

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

STATE HISTORIC PRESERVATION OFFICE

August 10, 2015

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

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

Dear Mr. Mathis:

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

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

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

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

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

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

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

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

Sincerely,



Sarah J. Beimers
Manager, Government Programs & Compliance



U.S. Department
of Transportation
**Federal Transit
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January 20, 2016

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

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

Dear Ms. Beimers:

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

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

Consultation Overview

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

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

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

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

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

Effects Findings

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

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

Table 1: Finding of Effects on Historic Properties Summary

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

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

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

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

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

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

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

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

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

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

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

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

Next Steps: Resolution of Adverse Effects

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

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

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

Enclosed for your review are:

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

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

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

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

Sincerely,



Marisol R. Simón
Regional Administrator

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

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

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

The City of Robbinsdale concurs with designations.

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

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

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

February 18, 2016

Dear Ms. Miller,

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

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

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

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

Sincerely,



Todd A. Larson,
Senior Planner



Hennepin County
Public Works

300 South Sixth Street
Minneapolis, MN 55415-1842

www.hennepin.us

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

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

Dear Greg:

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

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

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

Hennepin County Section 106 Consulting Party Input

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



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

February 19, 2016

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

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

Dear Mr. Mathis,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

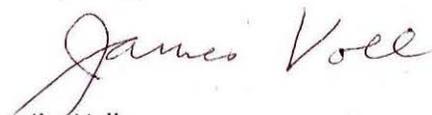
With regards to the relationship of the statue to the adjacent sidewalk, the final effects report states that there will be an adverse effect from the incorporation of a portion of the property's formal front yard. First and foremost, we believe that there can be no adverse effect about the relationship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

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

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

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

Sincerely,



Jim Voll

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

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



7800 Golden Valley Road
Golden Valley, MN 55427

February 19, 2016

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

Mr. Mathis,

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

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

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

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

Sincerely,

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

Emily Goellner
Associate Planner/Grant Writer

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

STATE HISTORIC PRESERVATION OFFICE

February 22, 2016

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

Dear Ms. Simon:

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

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

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

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

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

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

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

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

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

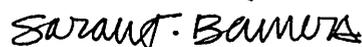
In regards to the "no adverse effect" findings above for which we have provided concurrence, if your agency determines that the project will not be carried out as proposed, then your agency will need to reopen Section 106 consultation pursuant to 36 CFR 800.5(a).

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

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

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

Sincerely,



Sarah Beimers, Manager
Government Programs & Compliance



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

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

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

February 29, 2016

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

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

Dear Mr. Nelson:

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

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

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

Sincerely,

Marisol R. Simón
Regional Administrator

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

Enclosures

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



Minnesota Department of Transportation

Office of Environmental Services

Mail Stop 620
395 John Ireland Boulevard

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

March 10, 2016

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

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

Dear Ms. Beimers,

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

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

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

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

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

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

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

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

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

Sincerely,



Renée Barnes, Historian
Cultural Resources Unit

Enclosures

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

Floyd B. Olson Memorial Statue National Register Boundaries



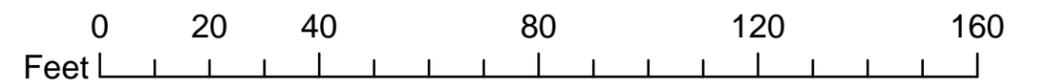
DATE: 3/10/2016



CULTURAL RESOURCES UNIT

Legend

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





Preserving America's Heritage

March 15, 2016

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

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

Dear Mr. Arkell:

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

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

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

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

March 28, 2016

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

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

Dear Ms. Barnes:

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

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

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

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

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

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

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

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

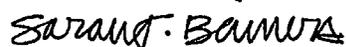
We agree with your agency’s determination that the Floyd B. Olson Memorial Statue remains eligible for listing in the National Register of Historic Places under Criterion C in the area of Art, as the work of master sculptor Carlo Brioschi and satisfies Criteria Consideration B: Moved Properties as the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

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

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

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

Sincerely,



Sarah J. Beimers, Manager
Government Programs & Compliance



Appendix H

Section 106 Supporting Materials

H.3 Section 106 Consultation Meeting Notes

1. Proposed BLRT Extension project Section 106 Consultation meeting notes, June 5, 2015
2. Proposed BLRT Extension project Section 106 Consultation meeting notes, July 10, 2015
3. Proposed BLRT Extension project Section 106 Consultation meeting notes, July 16, 2015
4. Proposed BLRT Extension project Section 106 Consultation meeting notes, February 4, 2016
5. Proposed BLRT Extension project Section 106 Consultation meeting notes, March 10, 2016
6. Proposed BLRT Extension project Section 106 Consultation meeting notes, March 24, 2016



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METRO Blue Line LRT Extension (BLRT)

5514 West Broadway Avenue, Suite 200, Crystal, MN 55428 www.bluelineext.org

Meeting Title: Section 106 Consultation – Meeting No. # 1

Date: June 5, 2015 **Time:** 9:00am **Duration:** 1.5 hours

Location: Blue Line Project Office (BPO) - 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by:

Greg Mathis – MnDOT CRU

Attendees:

SHPO: Sarah Beimers
USACE: Melissa Jenny
Hennepin County: Dave Jaeger
City of Brooklyn Park: Todd Larson
City of Golden Valley: Emily Goellner
Minneapolis Park & Recreation Board: Adam Arvidson
City of Robbinsdale: Marcia Glick
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Scott Reed, Janet Kennison, Jenny Bring, Tom Harrington, Sophia Ginis, David Davies, Miranda Adams

Discussion Notes

1) Welcome and Introductions

Kathryn O'Brien, BPO Assistant Director, welcomed consulting parties and explained that the Blue Line LRT Extension Project (BLRT) has transitioned to a point in the planning process where discussion is needed around impacts to historic properties from design of the Project.

2) Section 106 Process

Greg Mathis, Minnesota Department of Transportation Cultural Resources Unit (MnDOT CRU) explained that this is the first of several meetings related to the Section 106 process for the Project. The emphasis of the meeting today is on the Section 106 process, the findings published in the March 2014 Draft Environmental Impact Statement (Draft EIS) on what impacts the Project could potentially have to historic properties, and the process moving forward. Greg then led participants through the basics of the Section 106 process:

- Section 106 of the National Historic Preservation Act of 1966 requires Federal agencies to take into account the effects of their “undertakings” on historic properties. An undertaking can be something the agency is funding, permitting, or constructing on its own.
- The process is independent from, but completed in coordination with, the National Environmental Policy Act (NEPA) and Section 4(f) of the Department of Transportation Act. Discussions at these consultation meetings will inform what goes into the NEPA and Section 4(f) documentation.



METRO Blue Line LRT Extension (BLRT)

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Greg explained some of the terminology used in the Section 106 process, including and clarified certain points associated with each:

- Area of Potential Effect (APE) – The geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.
- Historic property – Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP).
 - Properties that are eligible for listing on the National Register of Historic Places (but not yet listed on it) are given equal consideration to already-listed properties during the Section 106 process and review.
- National Register of Historic Places – The Nation’s official list of properties worthy of preservation
- Integrity – The ability of a property to convey its significance
- Effect – Alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP.
 - Effects are assessed differently depending on which type of historic property is being impacted – impacts to archaeological resources are generally considered adverse only if direct, while direct and indirect impacts to historic structures can be considered adverse.
 - It is important to note that not all effects are adverse. Whether an effect rises to the level of being adverse depends on why a property is significant. For example, noise may not be as big of an impact to a structure eligible for its architecture while it could have a larger effect to a building used for meditation.

Greg and Kathryn then briefly explained the Section 106 process and the status of each step for the project:

- Initiate the 106 Process – Completed in 2011.
- Identify Historic Properties – Completed in 2014.
- Assess Adverse Effects – The assessment of adverse effects will be ongoing through 2015.
- Resolve Adverse Effects – If any adverse effects are identified, consultation would continue into early 2016 and avoidance, minimization, and/or mitigation measures, would be documented in the Section 106 agreement, a legally binding agreement. Kathryn noted that Federal Transit Administration (FTA) takes those obligations seriously and asks for regular updates on meeting mitigation stipulations in agreement documents.

a) Consulting party roles and responsibilities

Greg then explained the roles and responsibilities of the various parties in the Section 106 process including:

- FTA is the lead Federal agency responsible for meeting the requirements of Section 106. The U.S. Army Corps of Engineers (USACE) – from whom the Project requires a permit – has deferred to FTA as the lead federal agency pursuant to Section 106. If there is a Section 106 agreement, USACE will be a signatory.
- MnDOT CRU has been delegated authority by FTA to act on its behalf for portions of the Section 106 process, including defining the APE and assessing whether historic properties are subject to potential adverse effects.



METRO Blue Line LRT Extension (BLRT)

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- The Advisory Council on Historic Preservation (ACHP) oversees the work of Federal agencies in carrying out their responsibilities under Section 106.
- The Minnesota State Historic Preservation Office (SHPO) is a key partner, representing the state's interests in consulting with Federal agencies about the effect of their undertakings on historic properties.
- Indian Tribes and Tribal Historic Preservation Offices (THPOs) are another key partner, and consultation has been initiated with the appropriate Tribes.
- The Metropolitan Council is the local project sponsor and Federal grantee, responsible for certain parts of the Section 106 process including implementation of mitigation measures.
- Other consulting parties provide input to FTA and MnDOT CRU during consultation regarding effects. They have the option to sign a Section 106 agreement but no responsibility for its implementation. They include:
 - Local governments
 - Minneapolis Park and Recreation Board (MPRB)
 - Heritage preservation commissions (HPCs)
 - Other parties with a demonstrated interest in the Project's effects on historic properties.

In addition, the public has opportunities to comment during the Section 106 process. Open houses took place on May 28, 2015 in Crystal and June 4, 2015 in Minneapolis, and two more are upcoming on June 11, 2015 in Robbinsdale and June 17, 2015 in Brooklyn Park. There will be additional opportunities to comment prior to the publication of the Final EIS in April/May 2016. Kathryn and BPO Environmental Consultant Project Manager Scott Reed clarified that under Federal Highway Administration MAP-21 guidance, the Final EIS is released together with the Record of Decision (ROD), so the Section 106 effects determinations and agreement measures would be concluded and released for comment earlier to inform finalizing the documentation prior to issuing the joint Final EIS/ROD. A similar process is required for the Section 4(f) evaluation and USACE Section 404 permitting.

b) NRHP Criteria for eligibility and assessing effects

Greg explained the process and criteria used to evaluate properties for the NRHP. A property must meet at least one of four criteria:

- Criterion A – association with significant events, activities, or broad patterns of history.
- Criterion B – association with a significant person.
 - Criterion C – characteristic of a type, period, or method of construction; represent the work of a master; or have high artistic value.
- There are several Criterion C properties in the Project's APE.
- Criterion D – have the potential to yield important information about the past.
 - These are typically archaeological sites, and there are none identified within the APE.

Greg explained that a property must be at least 50 years, unless it possesses exceptional significance. In addition to possessing significance, a property must also retain sufficient integrity to convey its significance. Seven aspects of integrity that must be considered:

- Location: The place where the historic property was constructed or the place where the historic event occurred.
 - Relevant to this process because two properties within the APE have been moved from their original location – Labor Lyceum and the Floyd Olson Statue.



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- Design: The combination of elements that create the form, plan, space, structure, and style of a property.
 - This aspect is particularly important for properties of architecture significance.
- Setting: The physical environment of a historic property.
- Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.
 - This is more intrinsic and builds upon all the other aspects of integrity to determine if the property conveys what it was historically.
- Association: The direct link between an important historic event or person and a historic property.
 - This is also based on all other aspects, which combine to contribute to this aspect.

c) Section 106 and Overall Project Schedule

Greg oriented participants to where Section 106 fits within the overall project schedule. The process of assessing adverse effects will involve consultation meetings likely once or twice a month until December, and final determinations of effect will probably be made later this year. If any adverse effects are identified, these meetings would be used to move to resolve those effects. If analysis indicates there may be the potential for adverse effects, then the process for resolving the adverse effects would likely start later this summer/early fall.

Kathryn added that many of the consulting parties are already very informed through their involvement in the Issues Resolution Team (IRT) process and through following the evolution of the design. She highlighted that this process offers an opportunity to start focusing on historic properties and the Project's effects on those properties.

Greg explained that the next meeting will get into more detail on Project effects on individual properties. Kathryn presented the overall project timeline, noting that the environmental process is scheduled to conclude in August 2016, and Kathryn pointed out that while the seven-year overall timeline between project development and passenger operations is tight, it was done for the Green Line (Central Corridor) LRT.

3) Draft EIS Findings

Greg shared that the Draft EIS identified 14 historic properties within the APE; no archaeological resources were identified. He then provided further detail about how determinations of effects are made. The type of significance and integrity of a historic property are considered, as are both indirect (e.g., noise, vibration, visual) and direct (e.g., property alterations/acquisitions) effects, and both temporary and permanent effects. FTA makes the final determination of effect on historic properties. Greg clarified that just because there may be an effect, it may not be adverse.

4) BLRT Section 106 Consultation Meetings

The BLRT Section 106 Consultation meetings discussion was covered in items 2c and 6a.



METRO Blue Line LRT Extension (BLRT)

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5) Final EIS Project and Historic Properties Overview

Greg gave an overview of historic properties within the APE, presenting them roughly east to west along the project corridor:

- Minneapolis – Historic Properties
 - Minneapolis Warehouse Historic District (HD)
 - St. Paul Minneapolis & Manitoba Railway (Rwy.) HD
 - Northwestern Knitting Company (International Market Square building)
 - Sumner Branch Library
 - Wayman A.M.E. Church
 - Labor Lyceum
 - Floyd B. Olson Memorial Statue
 - Homewood HD
 - Osseo Branch of the St. Paul Minneapolis & Manitoba Rwy. HD
 - Grand Rounds HD – Theodore Wirth Segment
 - Adam Arvidson, Minneapolis Park and Recreation Board (MPRB) asked if the Chalet is part of the historic district or considered on its own. Greg responded that the entire Grand Rounds have been surveyed independently from this Project and found to be eligible, so it was accepted that the district is eligible and the Project did not look into individual eligibility of the resources within the district. He clarified that the Bridge L9327 is called out separately because it was previously determined to be individually eligible. Sarah Beimers from SHPO clarified that because they are in the district, they are eligible as part of the district, so it is not necessary to go to that extra level of analysis at the individual resource level.
 - Emily Goellner, City of Golden Valley, asked if all of Theodore Wirth Park is part of the GRHD, and Greg confirmed it is. Kathryn mentioned that a study is being conducted to respond to some comments received related to Theodore Wirth Park, specifically looking at critical viewsheds and identifying park resources within them. It will be shared later this summer.
- Golden Valley – Historic Properties
 - Grand Rounds HD – Theodore Wirth Segment
 - Osseo Branch of the St. Paul Minneapolis & Manitoba Rwy. HD
- Robbinsdale – Historic Properties
 - Sacred Heart Catholic Church
 - Robbinsdale Waterworks
 - Hennepin County Library, Robbinsdale Branch
 - Marcia Glick, City of Robbinsdale, noted that the library is currently an art gallery/museum and is NRHP listed.
 - West Broadway Residential HD
 - Marcia asked what this is and where it is located. Greg responded that it is a group of residences, generally extending along West Broadway, from just north of downtown Robbinsdale to Highway 100. He noted that the location is illustrated in the second to last page of the handout.
 - Jones-Osterhus Barn



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- Marcia added that this is now a printing company. She also indicated that the Osterhus family still owns it.
- Osseo Branch, St. Paul Minneapolis & Manitoba Rwy. HD
- Crystal – Historic Properties
 - Osseo Branch of the St. Paul Minneapolis & Manitoba Rwy. HD
- Brooklyn Park – Historic Properties
 - Osseo Branch of the St. Paul Minneapolis & Manitoba Rwy. HD
 - Kathryn/Scott clarified that a small portion of the Osseo Branch in Brooklyn Park is within the project APE.

A flyover video of the project corridor from east to west was shown. Greg identified historic properties along the line and their significance and Tom Harrington, BPO, provided a summary of project elements at key locations including those that may impact historic properties are located.

- Minneapolis Warehouse HD – Greg explained that effects of the project on this district are not being evaluated as part of this project because effects from combined LRT projects were examined under the Interchange Project. Tom indicated that at the Target Station the other currently active light rail project, Southwest Light Rail Transit, will stay up high over 7th Street and then land at grade at the Royalston Station. The BLRT project drops down from Target Field Station and crosses Olson Memorial Highway/7th Street intersection at grade. Kathryn shared that there have been many discussions with MnDOT regarding the daunting pedestrian at-grade crossings. Tom added that along Olson Memorial the LRT will be center running.
- Northwestern Knitting Company – Located (275 Market St) a couple of blocks near 7th Street. No effects are expected to this property.
- Sumner Branch Library – Eligible under Criterion A (611 Emerson Ave N) and is located in the northwest corner of the intersection at Emerson. Van White Station center platform will be on the east side of intersection with a train running down the center of Olson Memorial Highway – the goal is to not significantly change the existing look. The Limits of Disturbance (LOD) do not go much beyond the existing footprint of the present highway and definitely not outside the Right of Way (ROW), which includes the sidewalks and frontage roads in front of the library.
- Wayman A.M.E Church – Eligible under Criterion C (1221 7th Ave N), the mid-century modern church has a “witches hat” spire, and the property includes only the circular church in the center, not the surrounding structures. There are modified five and six lane concepts for this area, possibly involving two lanes westbound and three lanes eastbound (as today). In the six-lane concept would be converted to LRT use, but generally remain in the same location. With the six lane concept, there would be some level of impact to the frontage road in front of the church that is currently used for church parking. With the modified five lane concept, it may be possible to avoid impacting the parking. Improvements would still be within existing ROW and the Project will work to preserve as much as possible and limit impacts to within existing ROW throughout Olson Memorial Highway.



METRO Blue Line LRT Extension (BLRT)

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Labor Lyceum –Eligible under Criterion A (1800 Olson Memorial Highway) for its association with the Jewish community in Minneapolis. The existing ROW includes the two frontage roads, and the LOD would stay relatively the same as the ROW limit, though some sidewalks may be rebuilt.

- Floyd B. Olson Statue – Eligible under Criteria C and B (TH 55 at Penn Avenue North), and was originally in the median of the highway but was moved and the setting of the statue was reconstructed in relatively the same way, just turned 90 degrees. The IRT process has focused on a safer road for neighborhood development, what the speeds will be, etc. Through the station area planning process, project stakeholders (primarily the City of Minneapolis and Hennepin County) have evaluated the potential for developing excess property that MnDOT owns around the statue (excess ROW). The City has requested that the area be looked at for potential future redevelopment, though not as part of this project. She also shared that MnDOT ownership of the property has been confirmed. LRT is a catalyst to think about what this station area can become. Sarah Beimers from SHPO asked if the boundaries of the statute were known (e.g. the statute itself, or the plaza surrounding the statute). Greg responded that he did not know off the top of his head but would look into it and follow up.
- The Penn Station, which will be near the statue. It has a center platform, Located on the east side of the intersection, similar to the Van White Station.
- The transition from center running LRT on Olson to running in the BNSF rail corridor will begin set of Penn. To enable this transition to occur, some work will take place on the TH 55 bridges – the westbound bridge will be reconstructed further north to allow the LRT to descend to the rail corridor, although the eastbound bridge will remain.
- Grand Rounds Historic District: Theodore Wirth (segment of Grand Rounds Historic District)
- Bridge L9327 (Theodore Wirth Parkway over Bassett Creek)
- Homewood Historic District (bounded by Penn, Oak Park, Xerxes, and Plymouth Avenues).
- LRT will be constructed along east edge of Theodore Wirth Park in the railroad ROW, with stations at Plymouth and Golden Valley Road. Tom explained the reconstructed rail corridor and the need to move freight. Tom also noted issues related to poor soils and floodplain and wetland impacts BNSF has requested that the BLRT project provide a future access road adjacent to their relocated freight rail track. Kathryn added that the Draft EIS included analysis of an aggregate access road, reconstructed freight, and two lines of LRT. At that time, SHPO found no adverse effects on the rail line (Osseo Branch, St. Paul Minneapolis and Manitoba Railway Historic District), but the Project will continue discussions moving forward to confirm any impacts to the railway historic district.
 - Adam asked if BNSF is truly planning for an access road or another line. Scott explained that the Project will not preclude BNSF from future improvements. Emily Goellner, City of Golden Valley, asked about the turn at Olson and whether it may be a noisier area in the future (e.g. due to wheel squeal on the turn). Kathryn indicated that this is a possibility, and the Draft EIS analyzed that noise issue. The Final EIS will update that analysis and disclose expected noise impacts and mitigation options. Emily also asked about the possibility of increased BNSF traffic, and associated noise impacts. Kathryn responded that the freight line has talked about more trains but that Lance Meister, the noise expert for the Project and author of FTA noise guidance, has



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- advised that it is better to assume what the conditions are today (quieter) to focus the analysis on what the actual noise increase is from the LRT. If you assume more trains in the future, then the baseline noise is already higher.
- Some of the Xcel Energy overhead transmission lines will need to be relocated.
 - At the Plymouth Avenue Station, the Plymouth Avenue Bridge needs to be reconstructed to have fewer columns and wider spans to fit LRT underneath and accommodate trail connectivity, so the project is looking at potentially shifting the creek to the east. The area contains Soo Line and MPRB property, and the station would have an elevator/stairs to get down to station at the tracks. Emily asked about impacts of the vertical circulation to the park, and Greg explained that it is still being looked at and will be part of future discussions. Tom confirmed that visual impacts will be considered as design is moved forward.
 - On Theodore Wirth Parkway, the bridge can likely stay, along with the Golden Valley Road bridge. The station on the south side of Golden Valley Road is the only split platform-a configuration proposed to preserve the two existing bridges. The vertical circulation is on the south side of bridge.
 - North of the Golden Valley Road station is where BNSF put in fill pre-Clean Water Act. This was a major wetland, and retaining walls would be needed to retain the fill (floodplain impacts). The project is looking at structural options to minimize the floodplain impacts, including whether they could use the bridge to remove embankments as mitigation for floodplain and wetland impacts.
 - Adam noted that Theodore Wirth Park ends at Golden Valley Road, but that part of the Grand Rounds Historic District extends to the east. Tom indicated that LRT stays in the east side of the corridor.
-
- Robbinsdale Waterworks – Eligible under Criterion A (4127 Hubbard Ave N) includes the portion of the property on the north side of the black fence, the period of significance for the property is from 1930, and includes the water tower (part of the WPA work) and storage tanks.
 - Sacred Heart Catholic Church – Eligible under Criterion C (4087 West Broadway).
 - Hennepin County Library, Robbinsdale Branch Eligible under Criterion A.
 - The main effect on these properties is from the Robbinsdale Station. The Draft EIS examined the potential parking ramp, and the project continues to work with the city on park and ride design opportunities.
 - Will also need to consider noise for the church and library.
 - Marcia asked about the resources to the east of the West Broadway Residential Historic District, and Greg indicated that they were examined and found to be not eligible. Adam clarified that the Hennepin County Library, Robbinsdale Branch (4915 42nd Ave N) is listed, and Kathryn confirmed but reiterated that eligible and listed are considered the same in the Section 106 and effects process. Tom and Kathryn then explained that crossing improvements are happening at every roadway crossing, incorporating better pedestrian crossings, gates, etc. Other options for at-grade crossings are being considered through the design process undertaken by the IRT, but the solution is still being determined for the library location.



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- West Broadway Residential District – Abuts the rail corridor up to Highway 100, with the boundary roughly paralleling the alley on the west. There will be noise and visual effects from a retaining wall and other project elements in this area.
- Jones-Osterhus Barn – Eligible under Criterion C since it (4510 Scott Avenue N) is one of first and last of its type. There may be minor visual effects from project elements. Marcia noted that the Osterhus family still owns the barn.
- Minneapolis and Pacific Railway (Soo Line) HD – Crosses the project in Crystal, just north of Corvallis Avenue. Per the DEIS, the Project would be elevated in this location, while the BNSF continues at grade. Emily asked if that meant the LRT would go overhead, and Kathryn said yes, that freight lines will not allow at-grade crossings with LRT for safety reasons. Tom noted that LRT can accommodate steeper grades and lower clearances than freight.
- Osseo Branch Line, St. Paul Minneapolis & Manitoba/ Great Northern Railway HD – Eligible under Criterion A, the historic district is a 13-mile segment from Minneapolis to Osseo. The LRT alignment will extend from TH 55 northwest to Brooklyn Park, where the LRT alignment diverts from the railroad at 73rd Avenue North. The project will be constructing new stations, overhead catenary wires, support poles, lighting, TPSS and light rail vehicles within the historic district.
- 63rd Avenue Station Park and Ride– This is where there is an existing underutilized ramp. It currently accommodates 565 cars and express bus service. The Project team is looking at moving bus operations to 63rd Avenue and building a surface lot to the north, and possibly adding a third level at this ramp depending on the final outcomes of the park and ride projections. This was included in Draft EIS. Janet relayed a request by the City to keep the third level option. The project is considering adding a pedestrian crossing and access to the north end of the platform, similar to the Northstar freight crossings at Ramsey, Coon Rapids and Anoka stations, which are very tall to meet required freight clearances. This was not part of the Draft EIS scope and budget and effects on the NRHP eligible railroad would need to be considered.
- The alignment then leaves the BNSF corridor, crosses over 73rd Avenue and Highway 81 at-grade and becomes center-running on West Broadway. Kathryn concluded by saying that from here to end of the line, there are no historic properties. The remaining stations are on the south side of Brooklyn Boulevard, the south side of 85th Avenue, the south side of 93rd Avenue, and just west of the West Broadway/Oak Grove Parkway intersection. Kathryn noted that the reconstruction of West Broadway Avenue between Candlewood Parkway and 93rd Avenue is a separate project from the BLRT; this roadway reconstruction project has been in Hennepin County's plans since the early 2000s. North of Highway 610, they are looking at options for the Oak Grove Station and an operations and maintenance facility (OMF) on the north end of the line.

6) Schedule Upcoming Meetings

a) Regularly scheduled meetings through Q3 2015

Greg explained that they are finalizing the schedule for the next meeting, but it will likely be the first week of July (a notice will be sent in the next week or so). Kathryn explained that they will want to set up recurring meetings on everyone's schedule and can cancel if one is not needed. Caroline added that the Project may also be able to focus these meetings by city, and that they will lay out the agenda in advance. Adam weighed in that this would be very helpful.



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Kathryn closed the meeting by expressing that she is looking forward to getting good work done together and that meeting notes will be provided to the group.



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Meeting Title: Section 106 Consultation – Meeting No. 2A

Date: July 10, 2015 **Time:** 12:30pm **Duration:** 2 hours

Location: Blue Line Project Office (BPO) - 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by: Greg Mathis – MnDOT CRU

Invitees: SHPO: Sarah Beimers
Hennepin County: Dave Jaeger
City of Robbinsdale: Marcia Glick
City of Crystal: John Sutter
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Scott Reed, Janet Kennison, Lisa Rasmussen, Jenny Bring, David Davies, Miranda Adams, Parisa Ford, Kelly Wilder
MnDOT CRU: Greg Mathis, Jon Vimr

Discussion Notes

Greg Mathis, MnDOT Cultural Resources Unit (CRU), opened the meeting and led introductions.

- He explained that the first consulting parties meeting on June 5, 2015 introduced the Project and identified historic properties.
- The next steps are to consult on potential Project effects on historic properties in the Area of Potential Effect (APE) and reach agreement on whether different effects have the potential to result in an adverse effect. There are two meetings scheduled for this round of consultation – this meeting and one on July 16, 2015. This meeting covers properties in Crystal and Robbinsdale, while the second meeting will cover properties in Minneapolis, Minneapolis Park and Recreation Board owned property, Golden Valley, and Brooklyn Park including the Grand Rounds Historic District (GRHD). Both meetings include discussions of the Osseo Branch Line and the Theodore Wirth Park Cultural Landscape Study, and consulting parties are welcome to attend both meetings.
- Greg explained that U.S. Department of Transportation MAP-21 legislation calls for an expedited process. The goal of these meetings is to focus on properties where there is the potential for adverse effects, and consult on other properties as needed.

Greg described the meeting packet, which was sent to consulting parties via an emailed link to e-Builder (an on-line document management site being used for communications and transmittal of documents with consulting parties) and printed out for the meeting.

- The cover letter and packet constitute a formal submittal from MnDOT CRU to the State Historic Preservation Office (SHPO) and open a 30-day comment period. Comments can be sent to Greg at the address on the letter.



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- Following the cover letter are figures illustrating the Project APE and locations of all historic properties within the APE. The green and black dashed line is the Architecture/History APE, and the red and black dashed line is the Archaeology APE. The Archaeology APE is smaller because it encompasses only the potential for direct effects, while the Architecture/History APE must account for potential indirect effects such as noise and vibration.
- Also included in the packet is a handout explaining National Register of Historic Places criteria for evaluation and aspects of integrity, as well as summary handouts describing potential effects, if any, to each historic property. These summary handouts describe preliminary effects from the Project identified in the Draft Environmental Impact Statement (EIS) and updates based on the Project moving into design during development of the Final EIS. Each historic property is highlighted yellow on the plan sheet map accompanying its respective summary handout.

Kathryn O'Brien, Metro Transit Blue Line Project Office (BPO), introduced Lisa Rasmussen, also with BPO, who attended from the engineering team to assist in describing the current design of the Project. To orient attendees to the location of each historic property and show each property in greater detail, Lisa displayed detailed engineering roll plot maps throughout the discussions.

1) City of Crystal

Greg indicated that the discussion would now shift to a discussion of properties in Crystal.

Soo Line/Canadian Pacific (CP) Railway Historic District (HE-CRC-199)

- Eligible under NRHP Criterion A for its association with the statewide development of railroads and agriculture, it was the primary main line into the western portion of the state.
- The CP rail line currently runs through BNSF freight corridor, and the freight line crosses at grade. As part of the Project, freight will shift to the west side of the existing freight corridor. The freight crossing will shift west but will remain at grade, and LRT will be elevated on a bridge or retaining wall structure as it passes through the crossing.
- Greg explained that the historic district includes the entire right-of-way (ROW), not just the tracks. Since the LRT will clear span over the line, it will not have direct effects to the historic railroad corridor. The at-grade crossing will be shifted 10-15 feet, but it is not anticipated that will have adverse effects to the line's historic character.
- Elements of the LRT, such as the catenary wires, will be visible but only along a small portion of this linear resource and, therefore, the visual character of the corridor will not be adversely impacted.
- The line is not a noise sensitive receptor per FTA's criteria, and the existing freight rail is louder than LRT.
- Greg indicated that they do not anticipate an adverse effect and asked for any feedback. No additional comments were made.

2) Osseo Branch

Osseo Branch Line/Great Northern Railway Historic District (HE-RRD-002)

- Greg explained that the LRT corridor follows approximately eight miles of the Osseo Branch Line, passing through Brooklyn Park, Crystal, Golden Valley, Robbinsdale, and Minneapolis. The entire eligible line is



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approximately 13 miles long. It is eligible under NRHP Criterion A for its role in expanding potato farming in northern Hennepin County and for creating a new connection from the region to Minneapolis.

- Greg said that based on preliminary plans in the Draft EIS, the previous SHPO had expressed support for adaptive reuse of the corridor by LRT, rather than using the corridor for a rails-to-trails project, for example.
 - Sarah asked if project plans have changed since SHPO previously reviewed them. Kathryn explained that current project plans are essentially the same as when SHPO previously reviewed them in the Draft EIS, except that the freight rail line is now located next to the LRT line, and the access road is located to the west of the freight rail line (other revisions/updates are discussed in the next section).
- Greg explained that while design has yet to be finalized, various project elements such as overhead lines, new bridges, and corridor protection treatments, which are discussed further in the freight rail update, will be present within the historic district. Noise and vibration will also be present within the district, but the Osseo Line has historically experienced both of these and is not a noise sensitive receptor. In addition, operation of the LRT may spur development in nearby parcels, which could impact the integrity of the rail line.
- Based on the above potential effects, some additional analysis and consultation will be needed on this property.

3) Freight Rail Update

Kathryn began an update on freight rail related to the Project by explaining that as Project development has progressed, BPO has stepped up its coordination with BNSF, which operates in the historic Osseo Branch Line Railway Historic District.

- Lisa explained that BPO has been meeting with BNSF regularly and has received feedback that the railroad intends to own and operate freight trains on the approximate western 50 feet, and that they need to retain the ability to make future freight track or capacity improvements within that western 50 feet. They recommend shifting freight tracks closer to LRT tracks and designing and building an appropriate physical barrier to ensure safe operations.
- Engineering has incorporated changes based on this feedback including moving the access road from between freight and LRT (as proposed in the Draft EIS) to outside the BNSF tracks, so that freight maintenance needs do not conflict with LRT operations. Freight and LRT will each occupy 50 feet of the corridor in all concepts.
- Three “corridor protection treatments” for physically separating freight and LRT in case of derailment or a crash have been proposed, based on the physical character of the corridor.
 - Derailment ditch
 - Crash wall – Likely about six feet tall, although the height is not confirmed.
 - Retained embankment
- Various treatments could be implemented in different parts of the corridor. BPO is currently evaluating where each option will work best and is hoping to get feedback soon from BNSF representatives.
- Electronic intrusion detection devices may also be implemented, similar to those used where the METRO Blue Line (Hiawatha) LRT enters tunnels into Minneapolis/St. Paul International Airport.

Kathryn and Lisa then discussed additional items that have been a part of BPO and BNSF discussions.



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- Safety and logistics related to shared freight and LRT crossing have been points of discussion.
- “Pinch points” exist where there is less than 100 feet of ROW available, where the railroad previously sold land. All corridor protection treatments assume having 100 feet available, so unique solutions will have to be developed or land will have to be purchased back.

Kathryn concluded by discussing next steps in the discussions with BNSF.

- BPO and BSNF will continue to coordinate and seek consensus on LRT Project development, and the goal will be to ensure that any proposals are incorporated into the Final EIS.
- Kathryn pointed out that in reality there is little design flexibility, given that railroads generally have strict design and safety requirements.
 - Sarah asked if this means that, if one or more options have an adverse effect, there is no recourse for FTA. Kathryn replied that if the railroad has a safety concern, the opportunity to influence design will be very limited. This is similar to MnDOT finding safety issues with a historic bridge – the safety concerns would likely take precedence over an adverse effect finding.

4) City of Robbinsdale

Greg led a discussion of each historic property within the APE in Robbinsdale.

Jones-Osterhaus Barn (HE-RBC-264)

- The barn is eligible under NRHP Criterion C, in the area of agriculture and architecture, as a rare example of a barn from first period of agricultural development in Minnesota.
- Greg explained that the property line is a half block from the Project limits and that no acquisition or physical alternations have been proposed. In addition, the property is not anticipated to experience vibration from operations. No potential direct effects have been identified.
- BPO is in the process of designing the signalized crossing, which along with the catenary wires may have the potential to cause minor visual effects.
- Greg displayed photos of the property, including a view looking back toward the current railroad tracks, to illustrate that elements visible from the property might include passing trains, catenary poles, and wires. These elements would have only minor visual effects and would be unlikely to adversely affect the property.
- The barn is located in an area of moderate noise impacts but is not noise sensitive, so there is no adverse effect from noise.
 - Kathryn clarified that the Federal Transit Administration (FTA) noise analysis assesses the type of receptor, not just the surrounding geography. So while there may be residences nearby that are noise sensitive, the barn is not.
 - Sarah Beimers, State Historic Preservation Office (SHPO), asked about the barn’s current use, and Kathryn and Greg said their understanding is that it is used as storage for the printing business in an adjacent building. Sarah asked if access to the barn would change, and Kathryn explained that there would be no change in the access.
- Marcia Glick, City of Robbinsdale, asked if BPO has spoken with the Osterhaus family. Kathryn said she did not know but would check with others in her office.



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- Greg provided a brief recap of the discussion from earlier in the meeting. He indicated that the property is in a noise sensitive zone but is not classified as a noise sensitive receptor, and that MnDOT CRU anticipates no direct effects, minor visual effects, and no adverse effect overall. Therefore, MnDOT CRU and BPO are hoping not to consult further on this property unless there is a change in the project.
 - Marcia asked about any changes to access, and Greg clarified again that access will not change. Marcia also noted that the printing company on the site is now providing garbage stickers to residents free of charge, which the city appreciates.
- Greg asked if anyone else would like to bring up any additional potential effects or if there was general agreement with the assessment that there is no potential for adverse effects. He also welcomed any additional questions. No other comments were received.

West Broadway Avenue Residential Historic District (HE-RBC-158)

- Greg explained that the district is eligible under NRHP Criterion C, in the area of architecture. Project elements will not be built within the boundaries of the district, so they will not physically impact or alter the property. Therefore, it is anticipated that there will be no direct effects.
- Some project elements will be visible, however. The tracks passing nearby will be elevated, so some residences will have views of retaining walls, which Lisa clarified will be an average of 10 feet tall and closer to 17 feet tall closer to the Highway 100 bridge. At Highway 100, freight will stay on the existing bridge structure, and LRT will be built between the freight bridge and the existing West Broadway Avenue bridge.
 - Kathryn asked if Marcia has heard from residents, and Marcia said their biggest concern is that LRT passengers will be looking at them from above, bringing up privacy concerns. Noise and vibration are concerns as well. Marcia asked if LRT will be elevated with a privacy fence along the top of the wall, and Lisa said that level of detail has not yet been discussed in the issues resolution team meetings but that it could be feasible.
 - Sarah asked if a graphic of the elevation is available, and Lisa said there is not yet. Marcia pointed out that it becomes narrower as you approach Highway 100, so there is more of an opportunity for the train to be passing nearly on top of houses, raising greater concerns among residents.
- Greg said that because this resource is a Category 2 noise receptor, additional analysis will be required, as will vibration analysis.
 - Marcia pointed out that some residents use the alleys for access, and the train will be right above the alleys.
- Greg also indicated that potential effects from redevelopment will be assessed.
- Kathryn asked if there are any additional concerns, and Greg explained that this is a property on which MnDOT CRU plans to continue to consult.

Hennepin County Library, Robbinsdale Branch (HE-RBC-024)

- Greg explained that the property is eligible under NRHP Criterion A, in the area of education. Project elements will not physically impact or alter the property since it is across the street from the project, therefore it is anticipated that there will be no direct effects.



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- There may be indirect visual effects from overhead wires, support poles, and substations, and the proposed Robbinsdale Station may be visible from the property.
- The property is located within an area that will experience moderate noise impacts and is categorized as a Category 3 noise receptor, so effects will need to be fully analyzed before a final determination can be made.
- Because operation of the BLRT may spur development in nearby parcels, the potential effects of this will need to be examined once economic analysis is available.
 - Marcia indicated that it is helpful that the freight train will now be located farther away from the property (since the freight rail will be located adjacent to the LRT and the access road will be on the west closer to the property), because existing vibration already makes things teeter on the walls in the museum (current use of the library). Lisa said the LRT tracks will move some from their original location but not as much as originally planned, and Marcia said the concern is more with freight moving closer to the outside edge (closer to the property) than LRT moving.

Robbinsdale Waterworks (HE-RBC-286)

- Greg explained that the property is eligible under NRHP Criterion A, for its association with federal relief projects resulting from the Great Depression. More specifically, it is one of the remaining WPA public utility projects in Minnesota.
- While yet to be finalized, Project elements such as overhead wires, support poles, substations, and the proposed Robbinsdale Station may be visible from the property. Consultation will continue on these elements when more information is available, specifically on the park and ride lot.
 - Marcia said it is likely the park and ride lot will be located well away from the property, on the extreme opposite northern edge of the parcel.
- Kathryn asked for any additional concerns, and none were raised.

Sacred Heart Catholic Church (HE-RBC-1462)

- Greg explained that the church building, not including the rest of the property, is eligible under NRHP Criterion C, in the area of architecture. Project elements will not physically impact or alter the property since the project is at least a quarter to half block away; therefore, it is anticipated that there will be no direct effects.
- Project elements such as overhead wires, support poles, substations, and the proposed Robbinsdale Station may be visible from the property, but because it is eligible under Criterion C, these visual effects are not anticipated to be adverse. Proximity to the Robbinsdale Station may spur development in nearby parcels, which could lead to additional effects.
- The property is located within an area that will experience moderate noise impacts and is categorized as a Category 3 noise receptor, so additional analysis will be required before a final determination of effect.
 - Greg emphasized that noise would be primary concern to this historic property, and Kathryn said the noise analysis would likely be done later this summer.
- Marcia pointed out that the Robbinsdale City Council is discussing a potential pedestrian overpass or underpass at 41st Avenue.
 - Kathryn pointed out that there is the potential for a pedestrian overpass/underpass to affect Triangle Park. If so, it would need to undergo a 4(f) evaluation, separate from this process.



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- Marcia brought up grade separation, pointing out that if freight stays at grade and LRT goes under or over, it could have impacts to the West Broadway Residential historic district. Greg said that all current assessment is based on the current design, and Marcia pointed out that these are questions to keep in mind in case design changes.
- Lisa indicated that the engineering team had only looked so far at the underpass idea, and Marcia agreed that is likelier because an overpass requires more distance.
- Sarah asked if there is an existing crossing at 42nd Avenue, and Marcia said yes but that they are concerned additional capacity will be needed since the area is already so congested with school buses and other uses. Adding trains could bring circulation to a standstill, so they are looking into grade separation now before it becomes a problem and they are stuck with a configuration.
- Kathryn shared that visioning efforts are underway to discuss incorporating the station into the community, so they are proceeding under the assumption that grade separation is a realistic option. Marcia indicated that certain city council members would give up an at-grade station and put it underground if it means they could get grade separation. Kathryn emphasized that they will need to get to a politically and technically feasible option that will hopefully minimize environmental effects.
- Marcia pointed out that the city has been required to get approval every time it proposes to make improvements because of considerations about the church's design. Sarah explained various funding considerations that could drive why that is.

Greg concluded the agenda item by pointing out that all historic properties are included in the meeting packets but that only the properties in Crystal and Robbinsdale are being discussed today.

5) Overview/Discussion of Theodore Wirth Park Cultural Landscape Study

Kathryn segued into the final agenda item, a cultural landscape study of Theodore Wirth Regional Park (TWRP) undertaken in response to comments from the Minneapolis Park and Recreation Board (MPRB) on the Draft EIS. She explained that the goal of the study is to provide additional information pertaining to the elements of the cultural landscape within the park to inform analysis of effects.

Greg introduced Parisa Ford, Metro Transit BPO consultant team, principal investigator of the study.

- Parisa explained that the purpose of the study is to provide a historic context for the park and document its developmental history, as well as identify viewsheds and vantage points within TWRP where the BLRT project may be visible. The study identifies the physical characteristics to TWRP and, thereby, to the Grand Rounds Historic District (GRHD), and contributing elements within the area of potential effect (APE) and areas where the project may be visible.
- Landscape features were identified through a high-level reconnaissance review across the park, and contributing features were identified through historical research and more intensive field survey within the Architecture/History APE and viewsheds
- TWRP is a contributing element within the Theodore Wirth Segment of the GRHD, which is eligible for the National Register under:
 - Criterion A for Community Planning and Development and Entertainment/Recreation, as a nationally-significant example of late-19th and early-20th century park development.
 - Criterion C for Landscape Architecture, significant for its design and as the work of nationally-significant landscape architect H.W.S. Cleveland and park superintendent Theodore Wirth.



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- The GRHD's Period of Significance is 1884 to 1942, but it is currently under review to determine if it should be extended to c. 1975.
 - Kathryn clarified that the possible extension of Period of Significance is a larger effort not related to the BLRT Project.
 - Sarah explained that federal law provides that if such an effort is underway, the extended period should be considered in determining any effects.
- Parisa continued with an overview of the park's developmental history. Land was acquired incrementally from 1889 through 1952, and the original design follows the Country Park model established by Fredrick Law Olmsted and Calvert Vaux.
- Key plans that informed the design and development of TWRP:
 - Wirth's General Plan for the Improvement of Glenwood [Theodore Wirth] Park (1914) laid the overall framework of the park.
 - Eckbo, Dean, Austin and Williams' Minneapolis Parkway System Concepts for the Future (1971) is the next significant planning development, focusing on transportation and circulation and retaining the recreational value of the entire parkway system but making specific recommendations for TWRP. Recommendations by Eckbo, Dean, Austin and Williams were implemented in the early-1970s, related to transportation, signage, lighting, the park's functioning for recreational values, and the bicycle grand rounds concept linking the lakes.
 - Kathryn asked if bike and pedestrian improvements were made, and Parisa indicated that a focus was indeed to maintain both recreational and commuting access.
- Parisa discussed other important points in the park's development history: streetcar service was extended by 1916; by 1922 the Chalet, Theodore Wirth Parkway, and Theodore Wirth Golf Course were present; and by 1942, the WPA and CCC federal relief programs completed Bassett Creek Lagoons and other improvements. A streetcar structure remains on Glenwood Ave, which was historically an important access route to the park.
- Parisa continued into a discussion of the major landscape features in the park, emphasizing that it is a historic designed landscape. The primary components of the landscape include the grounds (topography, land use, and landscaping features) and bodies of water/water features (lakes, lagoons, and creeks).
- Other landscape features include circulation networks (roads, railroads, paths and trails); view and vistas; vegetation (oak woodlands, wet prairies); buildings and structures (Theodore Wirth Chalet, bridges); and small scale elements (fences and bollards, benches, picnic tables and other furnishings, memorials). The PowerPoint presentation contains images of many of these features, which Parisa described to consulting parties.
- Lisa asked about the bridges pictured, and Parisa clarified that only Bridge L9327 is historic. Kathryn indicated that Bridge 6247 was recently reconstructed so could not be historic, and Lisa agreed, saying that it will be reconstructed again as part of the Project.
- Greg asked if there were any questions on the report and explained that it would be presented again at next week's meeting because the park is located in Minneapolis and Golden Valley. He said that once the report is released, it will have its own 30 day comment period.



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6) Next Steps

Kathryn informed consulting parties that after the meeting next week, which is a continuation of this meeting; meetings will continue in late August once all comments have been received and the project has a better sense for what properties will have adverse effects.

- Information on noise and vibration analyses will be presented later in the summer or early in the fall.
- A final determination of effect will be made near the end of 2015, which will inform mitigation commitments that need to be documented in the Final EIS in early 2016.

Caroline Miller, Metro Transit BPO, explained that meeting materials will be posted to e-Builder along with previous meeting materials.

Sarah asked about the status of design, and Kathryn replied that engineering will be at about 15% design for the FEIS, which will include retaining wall heights, station locations, at grade versus elevated, and similar determinations.

- Items like the final placements of catenary poles, station finishing, and architectural elements will not be known at that point.
- Kathryn pointed out that, because the design will not be as far along, if there are Section 106 related concerns, they will need to be included in the Section 106 Memorandum of Agreement.
- Greg pointed out that they have asked engineering to advance certain elements of the design faster near historic properties.

Kathryn thanked participants and adjourned the meeting.



METRO Blue Line LRT Extension (BLRT)

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Meeting Title: Section 106 Consultation – Meeting No. 2B

Date: July 16, 2015 **Time:** 12:30pm **Duration:** 2 hours

Location: Blue Line Project Office (BPO) – 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by: Greg Mathis – MnDOT CRU

Invitees: SHPO: Sarah Beimers
Hennepin County: Dave Jaeger
City of Brooklyn Park: Todd Larson
City of Golden Valley: Emily Goellner
City of Minneapolis: Jim Voll
Minneapolis Park & Recreation Board: Adam Arvidson
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Scott Reed, Jenny Bring, Tom Harrington, Miranda Adams, Parisa Ford, Kelly Wilder
MnDOT CRU: Greg Mathis, Jon Vimr

Discussion Notes

Greg Mathis, MnDOT Cultural Resources Unit (CRU), opened the meeting and led introductions.

- He explained that this is the second of two meetings to begin to discuss effects and find agreement on which properties could potentially be affected by the METRO Blue Line LRT Extension (BLRT) Project. The meeting on July 10 covered properties in Crystal and Robbinsdale, while this meeting will cover properties in Minneapolis, in Golden Valley, and in Brooklyn Park, including the Grand Rounds Historic District (GRHD). Both meetings include discussions of the Osseo Branch Line and the Theodore Wirth Park Cultural Landscape Study.
- Greg described the meeting packet, which was sent to consulting parties via an emailed link to e-Builder (on-line document management site being used for communications and transmittal of documents with consulting parties) and printed out for the meeting. Primarily, the packets contain one-page summaries of each historic property within the Area of Potential Effect (APE), describing the NRHP eligibility of the historic property, project elements in the vicinity of the property, and potential effects on the property. Included with the summaries is a one-page key that describes aspects of integrity and the criteria of adverse effect (36 CFR 800.5). Additional drawings of the corridor are included as well.

Kathryn O'Brien, Metro Transit Blue Line Project Office (BPO), explained that the packet is meant to facilitate consulting parties offering feedback to MnDOT CRU today at the meeting and during the 30-day comment period.



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- By providing a preliminary determination of effect, it should help expedite deciding which properties do not have the potential to be affected by the Project and focus ongoing discussions on those properties that may have the potential to be affected.
- A formal determination of effects report will be released at the end of 2015 that summarizes the consultation process and FTA/MnDOT CRU's findings of effect.
- If it is determined that the Project could have adverse effects to any properties, there would be meetings with the consulting parties to review the Section 106 Memorandum of Agreement and discuss mitigation.

Greg asked that comments be returned within 30 days of his July 10, 2015 letter to the State Historic Preservation Office (SHPO), on which all consulting parties were copied.

1) City of Minneapolis

Greg introduced a discussion of properties in Minneapolis

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

- Greg explained that the district is eligible under NRHP Criterion A for its significance in the development of Minneapolis and St. Paul and importance as a component in the Great Northern railway's route west. The BLRT will connect to an existing LRT bridge at Target Field Station, which is where this rail line is located.
- The district is not noise sensitive under FTA criteria, and the railroad historic district itself will not be physically impacted or altered by BLRT project elements. Therefore, it is anticipated there will be no direct effects to this property. Indirect effects could result from visible Project elements along a small portion of the resource and potential redevelopment; however none of the direct or indirect effects are anticipated to have an adverse effect on the historic district.
- Kathryn noted that the Northstar Commuter Rail Line currently operates on the segment of the StPM&M line in this location.
- Greg explained that most effects were assessed during the Interchange Project, so they do not anticipate the need to consult further unless there are additional issues or questions.
 - Jim Voll, City of Minneapolis, asked for clarification. Greg clarified that the Interchange Project had a large APE to account for the effects of all future LRT projects in the vicinity. Therefore, it is not anticipated that there will be any effects identified in addition to those already identified and consulted on during the Interchange Project.

Minneapolis Warehouse Historic District (HE-MPC-0441)

- The district is eligible under NRHP Criterion A, in the area of commerce, and Criterion C, in the area of architecture.
- Similar to the StPM&M Historic District, indirect effects could result from visible Project elements, but effects were assessed during the Interchange Project, so they do not anticipate the need to consult further unless there are additional issues or questions.



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Northwestern Knitting Company Factory (HE-MPC-8125)

- Eligible under NRHP Criterion A, in the areas of commerce, engineering, industry, and invention, the factory housed the nation's leading producer and distributor of underwear ("Munsingwear").
- The building is at the far edge of the quarter-mile APE, almost three blocks away, so no direct physical effects are anticipated. Indirect effects could result from the potential development of parking lots and other vacant parcels surrounding the property; that development could occur before or after the BLRT is operational.
- The building is too far from the Project for assessment for noise and vibration impacts to be necessary. Currently, it houses International Market Square.
- Sarah Beimers, State Historic Preservation Office (SHPO), asked if redevelopment discussions had begun, pointing out that FTA regulations require that redevelopment is considered throughout a reasonable timeline into the future. Greg indicated that these conversations had not begun, and Kathryn added that the City of Minneapolis and Hennepin County have begun station area planning. Jim said that the City is looking at redevelopment opportunities in the area around the building but that they want to preserve a historic structure.
- Kathryn said that any effects in this location will have to be considered in the context of all improvements currently being proposed for Highway 55.

Sumner Branch Library (HE-MPC-8081)

- The library is listed under Criterion A in the areas of education and social history and Criterion B for association with a significant person.
- The property itself will not be physically impacted or altered by BLRT Project elements – the line and catenary wires will run down the median of Olson Memorial Highway, and the station will be located across the street. Therefore, it is anticipated there will be no direct effects to this property.
- Greg and Tom Harrington, BPO, explained that on the figures the proposed sidewalk locations are depicted by white lines, and the property lines are depicted in black, illustrating that the Project will not intrude upon the property and is 15-20 feet from the edge of the sidewalk.
- Other Project elements such as minor curb line reconstruction, new paths, lighting, and overhead catenary wires, as well as potentially signal bungalows and substations, the locations of which are yet to be finalized, may also be visible from the property.
- The property is categorized by the FTA as a Category 3 noise receptor, and additional analysis is being completed to determine potential auditory impacts.
- Jim indicated that he will initiate further discussions but does not currently think there are any impacts.

Wayman A.M.E. Church (HE-MPC-8290)

- The property is eligible under Criterion C in the area of architecture. BLRT Project elements will not physically impact or alter the property, which includes only the building and yard, therefore it is anticipated that there will be no direct effects.
- Non-related buildings including a school physically surrounding the property to the south, east, and west greatly hinder visibility of the BLRT Project, located along Highway 55, from this property and it is, therefore, anticipated that there will be no visual effects on the property.



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- The property is categorized by the FTA as a Category 3 noise receptor, so additional analysis is being completed to determine potential auditory impacts. The building separating the property from the Project will likely screen noise. Kathryn shared that the noise and vibration analysis will likely be completed and ready to share in late summer/early fall.
- Sarah asked if Highway 55 will remain six lanes, and Kathryn said that is very likely but that speed will likely be reduced. Jim added that the issues resolution teams have discussed reducing speeds and slowing traffic.
- Greg and Tom explained that they are still determining potential impacts to the on-street parking (located on a frontage road), but that is within MnDOT right-of-way, so it will not intrude on the property.

Labor Lyceum (HE-MPC-7553)

- The building is eligible under NRHP Criterion A, in the areas of social history and politics/government, for its association with early Jewish settlers in this part of Minneapolis.
- Project elements will not physically impact or alter the property; therefore, it is anticipated that there will be no direct effects. However, there is the potential for indirect effects from Project elements on Highway 55 that will be visible from the property, including catenary wires, signage, and potentially signal bungalows. No stations are in the vicinity; the Penn Avenue Station is three blocks away.
- The property is located in an area that will experience moderate auditory impacts, but is not categorized by the FTA as a noise sensitive receptor, given its current use.
- Greg explained that there will be a slight reconstruction of the curb lines along Highway 55 as well as the addition of a multi-use path running parallel to the curb, referencing the roll plot maps.
 - Sarah asked if the north-south running sidewalk would be obliterated. Kathryn explained that residents have requested the ability to cross the highway and that BPO has more detailed plans visualizing the pedestrian crossing experience.
 - Tom added that at Logan Avenue and Highway 55, the sidewalk will be removed. There are currently sidewalks running through the landscaped median, but they will all be moved to signalized crossings or a few better-defined midblock crossings. There will not be the continuation of local streets for crossing as before, for safety reasons.
 - Sarah noted that this would impact circulation.
 - Jim referenced the roll plot to point out that there is no sidewalk currently under the white dashed line in front of this historic property.

Floyd B. Olson Memorial Statue (HE-MPC-9013)

- The statute is eligible under Criterion C as the work of a master sculptor, Carlo Brioschi. It was moved to its current location from the center median of Highway 55.
- Although the statue itself will not be physically altered or impacted, the plaza in which it is located may undergo sidewalk and landscaping changes depending on whether the road is reconstructed as four or six lanes. Efforts are currently underway to clarify the memorial's boundaries to determine whether they include the plaza or only the statue, which will inform the determination of effect.



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- Kathryn said that as part of these efforts, she will be following up to get more information from Katie Roth, Metropolitan Council Project Manager, and from Summit Enviroolutions, the firm that is supporting the Section 106 review for the C Line (Penn Avenue Bus Rapid Transit [BRT]).
 - Sarah explained that the C Line APE will be submitted soon.
- Greg continued in stating that the BLRT station will occupy the center median, while the BRT stations will be located on the outside of the roadway. Once design and boundaries of the property are clarified, they will have a better idea of how much consultation will be required.
- Tom indicated that there are not true sidewalks currently but that changes from the projects will include constructing new sidewalks and incorporating some current pavement into the boulevard. Greg pointed out that the area around the statue that will potentially be impacted is not a park, rather it is MnDOT right-of-way.
- Greg concluded by noting that the property is not categorized by the FTA as a noise sensitive receptor.

Homewood Historic District (HE-MPC-12101)

- The district is eligible under Criterion A in the areas of community planning and social history. On the plans provided, Greg explained that the blue line is the BLRT alignment and the orange line is the freight line, and pointed out the Plymouth Avenue Station.
- He explained that the district is located on a bluff, 10-15 feet above the rail corridor, separated by heavy vegetation. Given the distance between the district and the Project, Project elements will not physically impact or alter the district; therefore, it is anticipated that there will be no direct effects.
- As currently proposed, the BLRT will run along existing BNSF right-of-way immediately west of the district, with the Plymouth Avenue Station and associated elements, including vertical circulation, being constructed directly northwest of the district. Additional elements including substations, signal bungalows, and corridor protection treatments yet to be finalized may extend vertically and be visible from the district, but overall effects will be minimal. In addition, some vegetation will be cleared.
- The district (comprised of residential properties) is categorized by the FTA as a Category 2 noise receptor, and several sites within the district are located in an area that will experience moderate noise impacts. Additional analysis and further consultation will be required to determine how to minimize and mitigate effects.
- Sarah asked whether the Plymouth Avenue Bridge will be reconstructed as explained on the overview sheet. Kathryn said it will be replaced to accommodate more elements underneath it, but that it will look very similar.
- Kathryn noted that various station locations were considered within Minneapolis, all of which would have had impacts to Theodore Wirth Regional Park, so there was not a clear answer whether to locate the station on the north or south side of Plymouth Avenue.
- Adam Arvidson, Minneapolis Park & Recreation Board (MPRB), said the decision was based largely on impacts to adjacent residences. There is a steeper slope on the north, and it is more vegetated, but the south location would have felt more like it was in people's yards. He explained that it was a hard decision but that the northern location was ultimately chosen.
- Tom explained various elements on the roll plot map – the white lines are secondary access for safety reasons, the blue lines represent retaining walls or abutments as indicated by preliminary engineering, and approaching the bridge, the map shows vertical circulation, new sidewalks, and a bus pull off.



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2) Osseo Branch of the St. Paul Minneapolis & Manitoba Railway Historic District (HE-RRD-002; HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389)

Greg introduced a discussion of the Osseo Branch Line/Great Northern Railway Historic District.

- The district is eligible under Criterion A for its role in expanding potato farming in northern Hennepin County and for creating a new connection from the region to Minneapolis. It begins in Minneapolis south of Target Field, continues into Osseo, and extends 1.5 miles past downtown Osseo. The Project will use approximately eight of the 13 miles of corridor constituting the historic district.
- Greg continued that the corridor is 100 feet wide, BLRT will occupy the eastern 50 feet of the corridor, the freight tracks now in the center of the corridor will shift to the west, and an access road will be built outside the freight rail tracks.
- Project elements within or visible from the district will include tracks, catenary wires, substations, signal bungalows, and corridor protection treatments yet to be finalized. In addition, near the 63rd Street Station at the north end of the corridor, an overhead crossing would connect the station to the park-and-ride lot.
- Noise and vibrations will be present within the district, but the Osseo Line has historically experienced both of these and is not a noise sensitive receptor. In addition, operation of the BLRT may spur development in nearby parcels, which could impact the integrity of the rail line.
- Jim asked if the effects discussed would be direct effects, and Greg said they would, but that SHPO has indicated that introduction of LRT into the corridor would not necessarily result in an adverse effect. However, there have been some design changes since SHPO provided feedback on the plans in the Draft EIS. Jim clarified that a direct effect does not necessarily mean an adverse effect, and Kathryn and Greg confirmed this.

Freight Rail Update

Kathryn continued that although SHPO indicated there would not be adverse effects based on the Draft EIS plans, the potential changes are based on discussions with BNSF, which operates in the historic Osseo Branch Line Railway Historic District, and their decision to implement corridor protection measures for safety reasons.

- Based on discussions with BNSF, three types of physical barriers have been proposed for corridor protection, and the decision about which measures to implement where along the corridor will depend on soil assessment, locations of certain Project elements such as at-grade crossings, and ongoing discussions with the railroad.
- Tom presented a typical section portrayed in the Draft EIS to illustrate how freight will now be built in the western portion of the corridor. He then displayed illustrations of the potential corridor protection measures:
 - Derailment ditch
 - Crash wall – Likely about 6-8 feet tall, although the height is not confirmed, with 2-2.5 foot thick walls.
 - Retained embankment
 - Emily Goellner, Golden Valley, asked if the crash walls would be cement, Tom clarified they would likely be concrete.
 - Jim asked how long the treatment would run, and Kathryn answered that the exact length still needs to be decided. Tom clarified also that the treatment will change along



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the corridor. Kathryn said BNSF has indicated it might be possible to decide by the end of the year which treatments will be implemented where.

- Greg closed the update on freight rail by explaining that a final understanding of how freight and BLRT will operate will not be finalized until later in engineering. Tom emphasized it is safe to say that there will be some kind of crash deterrent device in the corridor. Greg then displayed some photos of the corridor.

3) Grand Rounds Historic District – Overview of Theodore Wirth Park Cultural Landscape Study and Discussion

Greg introduced a discussion on the GRHD and Theodore Wirth Regional Park (TWRP).

Grand Rounds Historic District: Theodore Wirth Segment (XX-PRK-0001)

- The Grand Rounds Historic District (GRHD) is eligible under Criterion A in the areas of community planning and entertainment/recreation, and under Criterion C in the area of landscape architecture.
- Assorted project elements, including overhead wires, lighting, support poles, stations, corridor protection treatments, the reconstructed Plymouth Avenue Bridge, and a new bridge at TH 55, which may be visible from the district.
- In addition, the Theodore Wirth Segment is in proximity to several parcels of land that may be developed as a result of the BLRT, and additional analysis is being completed for the Final EIS to determine potential auditory impacts.

Bridge No. L9327 (Theodore Wirth Parkway) (HE-GVC-0050)

- This bridge is individually eligible under Criterion C as a concrete highway bridge displaying notable aesthetics and as a contributing resource within the GRHD. It is located east of the Chalet on Theodore Wirth Parkway, and its significance stems from its walls and railings.
- Greg explained that the bridge is a few hundred feet from any Project elements, so the BLRT Project will not physically impact or alter the district, so it is anticipated that there will be no direct effects.
- The bridge itself is not noise sensitive, but additional analysis is being completed to determine potential auditory impacts on the GRHD.

Theodore Wirth Park Cultural Landscape Study

Greg introduced Parisa Ford, BPO consultant team, principal investigator of a cultural landscape study of TWRP.

- Kathryn explained that the study was undertaken in response to comments from the MPRB on the Draft EIS, with the goal of providing additional information pertaining to the elements of the cultural landscape within the park to inform analysis of effects.
- Parisa explained that the purpose of the study is to provide a historic context for the park and document its developmental history, as well as identify viewsheds and vantage points within TWRP where the BLRT Project may be visible. The study identifies the physical characteristics contributing to TWRP and, thereby, to the GRHD, and contributing elements within the APE and areas where the Project may be visible.



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- Landscape features were identified through a high-level reconnaissance review across the park, and contributing features were identified through historical research and more intensive field survey within the Architecture/History APE and viewsheds
- TWRP is a contributing element within the Theodore Wirth Segment of the GRHD, which is eligible for the National Register under:
 - Criterion A for Community Planning and Development and Entertainment/Recreation, as a nationally-significant example of late-19th and early-20th century park development.
 - Criterion C for Landscape Architecture, significant for its design and as the work of nationally-significant landscape architect H.W.S. Cleveland and park superintendant Theodore Wirth.
- The GRHD's Period of Significance is 1884 to 1942, but it is currently under review to determine if it should be extended to c. 1975.
- Parisa continued by providing an overview of the park's developmental history. Land was acquired incrementally from 1889 through 1952, and the original design follows the Country Park model established by Fredrick Law Olmsted and Calvert Vaux.
- Two key plans informed the design and development of TWRP:
 - Wirth's General Plan for the Improvement of Glenwood [Theodore Wirth] Park (1914) laid the overall framework of the park.
 - Eckbo, Dean, Austin and Williams' Minneapolis Parkway System Concepts for the Future (1971) is the next significant planning development, focusing on transportation and circulation and retaining the recreational value of the entire parkway system but making specific recommendations for TWRP. Recommendations by Eckbo, Dean, Austin and Williams were implemented in the early-1970s, related to transportation, signage, lighting, the park's functioning for recreational values, and the bicycle grand rounds concept linking the lakes.
- Parisa discussed other important points in the park's development history: streetcar service was extended by 1916; by 1922 the Chalet, Theodore Wirth Parkway, and Theodore Wirth Golf Course were present; and by 1942, federal relief programs completed Bassett Creek Lagoons and other improvements.
- Parisa continued into a discussion of the major landscape features in the park, emphasizing that it is a historic designed landscape. Categories of landscape features are defined by the National Park Service. The primary components of the landscape include the grounds – topography, land use, and landscaping features – and bodies of water/water features – lakes, lagoons, and creeks.
- Other landscape features include circulation networks (roads, railroads, paths and trails); historic and design-intended views and vistas; vegetation (oak woodlands, wet prairies); buildings and structures (Theodore Wirth Chalet, bridges); and small scale elements (fences and bollards, benches, picnic tables and other furnishings, memorials). The PowerPoint presentation contains images of many of these features, which Parisa described to consulting parties.
 - Jim noted he was impressed that the WPA picnic tables have lasted as long as they have. Adam said yes, they are made out of metal and cement, and that there are actually quite a few of them in the park system.
- Greg concluded the presentation by emphasizing that the report will help inform the assessment of effects for the TWRP cultural landscape.



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- Scott Reed, BPO, asked if paper copies would be printed for all parties. Kathryn indicated that it is a large file, so while they will send a hard copy to SHPO, all other consulting parties will be provided a link via e-Builder unless they request a hard copy.
- Jim asked if meeting materials are posted, and Kathryn said yes, they are on e-Builder as well. Caroline Miller, BPO, can be contacted with any technical difficulties.
- Adam asked if, during the discussion about potential impacts to the GRHD, floodplain and wetland mitigation will be discussed. Greg replied that it will be.

4) Next Steps

Greg welcomed any questions and reminded consulting parties that written comments will be accounted for as the process moves forward.

- The next consultation meeting will be held in late August so that all comments can be received and inform the discussion at that meeting, and further meetings will follow throughout the fall.
- Greg explained that U.S. Department of Transportation MAP-21 legislation calls for an expedited process, so the goal of these meetings is to focus on properties where there is the potential for adverse effects, and consult on other properties, as needed.
- Sarah asked if resources associated with the GRHD can continue to be commented on in the 30 days following release of the landscape report. Greg clarified that the purpose of eliciting comments on the material presented in this meeting is to ensure all issues regarding potential effects have been identified. Sarah and Greg discussed that consulting parties are not being asked at this point to concur with a final determination of effect on any resources. Greg also clarified that the landscape report will have its own 30-day review period.
- Greg pointed out that they have asked engineering to advance certain elements of the design faster near historic properties to inform future discussions and the effect analysis.



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Meeting Title: Section 106 Consultation – Meeting No. 3

Date: Feb 4, 2016 **Time:** 1:30pm **Duration:** 3 hours

Location: Blue Line Project Office (BPO) - 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by: Greg Mathis – MnDOT CRU

Invitees: FTA: Reggie Arkell, Maya Sarna
SHPO: Sarah Beimers
Hennepin County: Dave Jaeger, Brent Rusco
City of Brooklyn Park: Todd Larson
City of Golden Valley: Emily Goellner
City of Minneapolis: Jim Voll
Minneapolis Park & Recreation Board: Adam Arvidson
City of Robbinsdale: Marcia Glick
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Scott Reed, Jenny Bring, Paul Danielson, Sophia Ginis, David Davies, Shelley Miller, Kelly Wilder
MnDOT CRU: Greg Mathis, Jon Vimr

Discussion Notes

1) Welcome and Introductions

Greg Mathis, Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU), opened the meeting, described the agenda, and led introductions.

- The primary goal of the meeting is to review the Federal Transit Administration's (FTA's) findings of effect on historic properties and the overall determination of effect for the METRO Blue Line Light Rail Transit (LRT) Extension Project (Project). This will help to identify which properties have effects that may be easily resolved during the meeting so that future meetings can focus on the remaining properties requiring further discussion with consulting parties.
- Greg reminded consulting parties that MnDOT CRU is overseeing many aspects of the Section 106 process for the Project on behalf of the FTA.

2) Project Updates

Kathryn O'Brien, Metro Transit Blue Line Project Office (BPO), explained that the Project anticipates completing the Project Development phase of the FTA New Starts program in August of 2016.

- The Project is in the midst of the Municipal Consent process and anticipates its completion in March or April of 2016.
- The Project then anticipates issuance of the National Environmental Policy Act Record of Decision (ROD) in August of 2016.

3) Section 106 Process

FTA issued its Final Determination of Effect (DOE) on historic properties and submitted it to the Minnesota Historic Preservation Office (MnHPO) on January 20, 2016. The Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties (Assessment of Effects) report assesses effects on historic properties in the Area of Potential Effect (APE), provides a finding of effect for each property, and an overall determination of effects on historic properties for the Project.

- Since the last consulting parties meeting in July 2015, MnDOT CRU identified and assessed effects, which are accounted for in the Assessment of Effects report. The findings are based on 15 percent to 30 percent design plans. It is a challenge to consult on effects while design is continuing to advance; however, certain aspects of the design were advanced so that MnDOT CRU could assess effects.
- FTA found the Project will have an adverse effect on six properties, no adverse effect on six properties, and no adverse effect on five properties with implementation of measures in the Memorandum of Agreement (MOA).
- Since the Project will have an adverse effect on six properties, it will have an overall adverse effect on historic properties.
- Jim Voll, City of Minneapolis, asked Greg to clarify the effect of consulting parties' comments on the findings in the Assessment of Effects report, since the report is entitled "Final."
 - Greg explained that they are eliciting feedback from consulting parties and hoping for agreement.
 - Further, the MOA will include provisions for continuing consultation as the Project design advances. Sarah Beimers, MnHPO, added that this will include developing minimization and mitigation strategies.
 - Kathryn pointed out that since the Project is at 15 percent to 30 percent design, FTA conservatively made calls of adverse effect for properties that were in question.
 - Jim pointed out that there are properties for which the City of Minneapolis may agree with the adverse effect finding but disagree with the proposed mitigation, in addition to properties for which they disagree there is an adverse effect.

Greg segued into a review of the Project's progress through the Section 106 process.

- Initiation of the Section 106 process was completed in 2011.
- Identification of historic properties was completed in 2014.
- With publication of the Assessment of Effects report, the assessment of adverse effects was completed in January 2016, which included applying the criteria of adverse effect.
- Resolving adverse effects will continue through the first and second quarters of 2016.
- Section 106 does not require projects to avoid adverse effects; some are unavoidable.
- If there is an adverse effect, consultation must consider measures to avoid, minimize, and/or mitigate the adverse effect(s), and consulting parties and the public remain involved to inform the development of these measures for inclusion in an MOA.
- An MOA is a legally binding agreement that includes stipulations recording agreed-upon avoidance, minimization, and mitigation measures. An execution-ready version of the MOA is included in the final environmental impact statement (EIS).
 - Three types of parties can be involved in executing an MOA:
 - A signatory has obligations under Section 106 and authority to execute, amend, or terminate the MOA. Signatories for the Project will include FTA, MnHPO, and the Advisory Council on Historic Preservation (ACHP), if it chooses to participate.

- An invited signatory has obligations for implementing stipulations of the MOA and authority to execute, amend, or terminate the MOA. Invited signatories include Metropolitan Council and MnDOT.
 - A concurring party has no authority to execute, amend, or terminate the MOA, and their signature is not required to execute the MOA. This includes cities, heritage preservation commissions (HPCs), the Minneapolis Park and Recreation Board (MPRB), etc.
- The Project should know if the ACHP has elected to participate by late February or early March.
- Greg described that concurring party status allows for a level of involvement by parties that may need to participate in continued consultation.
 - Sarah clarified that concurring parties can continue to be involved if mitigation or interpretation is being discussed for a property they have an interest in, but they do not have the authority to amend or terminate the MOA, and they do not have to sign it for the MOA to be valid.

4) Effects Findings

Historic Properties: No Adverse Effect

- Minneapolis Warehouse Historic District (Minneapolis)
 - Given its proximity to the Target Field Station, effects to this property were previously accounted for during development of a programmatic agreement (PA) for the Intermodal Station (the previous name for the Target Field Station) during the Interchange Project.
 - No further consultation on this property is needed unless consulting parties have additional concerns.
 - Jim indicated that the city does not disagree with this; however, he has not consulted all appropriate management so cannot say that is the final word.
 - Sarah noted that MnHPO has not completed its review either.
- St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District (Minneapolis)
 - The LRT alignment will pass over this property on an elevated structure so it will only have minimal visual effects.
 - Effects to this property were also previously accounted for during the Interchange Project; therefore, no further consultation on this property is needed on this property.
- Northwestern Knitting Company (Minneapolis)
 - This property is just under a quarter mile from the Project alignment, so it is possible that some Project elements could be visible from the upper levels of the building. There is also the potential for redevelopment around the station that could change the property's setting. However, since the property was developed in an urban setting, these potential effects will not interfere with the property's ability to convey its significance.
 - Jim repeated that as with the prior two properties, he does not disagree with this assessment but needs to discuss it with others at the city.
- Bridge No. L9327 (Golden Valley)
 - Theodore Wirth Parkway crosses Basset Creek over Bridge No. L9327, a few hundred feet north of Wirth Chalet.
 - The bridge is a contributing element to the Grand Rounds Historic District (GRHD), but effects on it were assessed separately since it is also individually eligible under Criterion C for Engineering.
 - The introduction of Project elements into the view from the bridge to the Project will have a minimal impact, but since the bridge derives its significance from its design, it will not interfere with the ability of the property to convey its significance.

- Adam Arvidson, Minneapolis Park and Recreation Board (MPRB), indicated that he likely concurs with this finding.
- Jones-Osterhus Barn (Robbinsdale)
 - There will be no direct effects to the property, but some Project elements may be visible from the property. However, the Project is approximately 190 feet away and visibility of the Project is limited. Therefore, a finding of no adverse effect has been made.
- Minneapolis & Pacific Railway / Minneapolis, St. Paul & Sault Ste. Marie Railway Historic District (Crystal)
 - The Burlington Northern Santa Fe (BNSF) Railway alignment will be shifted and reconstructed at-grade, and the LRT bridge will clear span this historic railroad district. Since there are no physical effects and limited visual effects (to less than 1 percent of this long linear rail corridor), there will be no adverse effect from the Project.

Historic Properties: No Adverse Effect with Implementation of Measures in the MOA

- Sumner Branch Library (Minneapolis)
 - The Project will be constructed within the adjacent Olson Memorial Highway roadway. The construction limits border but do not impinge on the historic property, and as long as a historic bench near the property's limits is protected, the Project will not have direct effects on the property.
 - The Van White Station is located kitty-corner to the library, approximately 320 feet away, so the property will experience visual effects. To avoid a potential adverse effect, the Project proposes to design all Project elements within the vicinity (potentially one block on either side) consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI's Standards).
 - A construction protection plan will also be developed prior to construction to ensure there is no damage to the property, including installing fencing to protect the property and assessing the need for vibration monitoring.
 - With implementation of a construction protection plan and designing Project elements to the SOI's Standards, a finding of No Adverse Effect has been made for the Sumner Branch Library.
 - Sarah pointed out that the MOA will need to be clear about what is meant by "in the vicinity" – whether it is some distance around each station or between certain mileposts.
 - Jim asked how these stipulations will apply for properties on which the Project will have an adverse effect.
 - Kathryn reiterated the goal that if consulting parties can agree that a certain number of properties have no adverse effect and another number have no adverse effect with implementation of MOA measures, they can then focus on discussing properties with adverse effects that will need more specific mitigation measures.
 - Jim pointed out that the city had commented on construction concerns, and design to the SOI's Standards seems reasonable. However, he said that designing to the SOI's Standards needs to be balanced with other concerns. For example, the city is concerned about pedestrian access and safety, and Jim asked how those concerns will be balanced in order to work toward the overall best interest.
 - Greg agreed that the Project has to balance a lot of goals. This is similar to how the Southwest LRT project is handling effects to the historic Minikahda Club in Minneapolis. The Southwest LRT project originally proposed substantial changes to the property's entry and addition of retaining walls; however, they worked with Minneapolis Public Works on a revised design that met public safety standards while avoiding an adverse effect to the property.

- An administrative stipulation in the BLRT MOA will outline dispute resolution options in case effects are not ultimately resolved through consultation.
- Labor Lyceum (Minneapolis)
 - Visual effects on the historic property (eligible under Criterion A) are possible from construction taking place across the access road, and from Project elements including the alignment and the overhead power systems. Proposed MOA measures include designing Project elements in accordance with the SOI's Standards so as not to introduce incompatible visual elements.
 - Per FTA criteria, the Labor Lyceum is a Category 3 noise receptor; however, LRT operation will not result in a noise impact so no noise mitigation is required.
 - With Project infrastructure in the vicinity of the Labor Lyceum designed in accordance with the SOI's Standards, a finding of no adverse effect has been made for the Labor Lyceum.
- Sacred Heart Catholic Church (Robbinsdale)
 - The property includes the church only, which is eligible under Criterion C for Architecture. The church is located 300 feet from the alignment, and the closest Project elements (road improvements) are 130 feet from the property, so there are no direct effects anticipated.
 - The Project alignment, a park and ride structure, and other Project elements will be visible from the property but will not affect its ability to convey its significance.
 - The church is a Category 3 noise receptor that would experience severe auditory effects without mitigation, but the Project is implementing a quiet zone that will avoid the adverse effect.
- Robbinsdale Waterworks (Robbinsdale)
 - Various Project elements, including the Robbinsdale Station and a park and ride, will be highly visible in the vicinity of the iconic waterworks, so all Project elements will be designed in accordance with the SOI's Standards so as not to have adverse visual effects on the property.
 - Although the Project wraps around two sides of the property, it will not physically infringe upon it. However, a construction protection plan will be implemented to ensure that there are no direct effects to the property and to identify any other measures necessary to protect the property during construction.
 - With implementation of a construction protection plan and design in accordance with the SOI's Standards, a finding of no adverse effect has been made for the waterworks.
- Hennepin County Library, Robbinsdale Branch (Robbinsdale)
 - Similar to the Sacred Heart Catholic Church and Robbinsdale Waterworks, Project elements extend along the boundary of the property but will not physically infringe upon it. A construction protection plan will be implemented to ensure that there is no physical harm to the property.
 - The view of the park and ride located directly across the Project alignment from the property will be fairly prominent, so Project elements in the vicinity will be designed in accordance with the SOI's Standards.
 - There will be a change in access to the property from westbound on 42nd Avenue, but westbound traffic can still access the alley to get to the property so there are no traffic-related adverse effects.
 - The library is a Category 3 noise receptor that would experience severe auditory effects without mitigation, but the Project is implementing a quiet zone that will avoid the adverse effect.
 - Sarah asked for clarification on what constitutes a "quiet zone." Kathryn explained that in a quiet zone, neither freight nor LRT will sound horns; however, LRT trains could potentially use their bells. Alternatively, the Project is looking at potentially using fixed wayside devices at quiet zone intersections so that the sound would remain at the crossing rather than on the trains affecting a larger area as the train moves through the crossing.

Historic Properties: Adverse Effect

- Wayman A.M.E. Church (Minneapolis)
 - The property is eligible under Criterion C for Architecture and is buffered from any potential direct visual or noise effects from the Project by other buildings that wrap around it.
 - Planning studies call for up-zoning property around Van White Station to redevelop the area as a commercial center with higher density, mixed use buildings. An adverse effect has been found since this is a specific parcel targeted in plans for redevelopment related to the Project, rather than general market forces.
 - Jim countered that the city does not view this property as a redevelopment opportunity. Their planning maps call for mixed use, and if it were not a church at some point, they would encourage another use. However, it is already zoned R5 for high density with or without the BLRT Project, so he disagrees that their planning efforts target this parcel for redevelopment. In addition, city plans account for preserving historic properties. Jim stated that they will have to agree to disagree on this finding.
 - Kathryn asked about the Project potentially developing a National Register of Historic Places (NRHP) nomination as mitigation, and Jim responded that the property is already noted as being historic in city planning efforts. The city previously stated that they would support nomination efforts but do not want to be responsible for funding or completing it themselves.
 - Greg clarified that the Project can commit to funding the preparation of a nomination but cannot guarantee it will be successful, that is up to the Keeper of the National Register to decide.
 - Sarah added that NRHP-listed churches can utilize state Legacy Grant funding for repairs.
 - Jim concluded by calling for further discussion between the Project and the city.
- Floyd B. Olson Memorial Statue (Minneapolis)
 - The Project will use a portion of the memorial's sodded yard and sidewalk adjacent to Olson Memorial Highway located within the NRHP-eligible property for a new sidewalk needed due to reconstruction of Olson Memorial Highway.
 - The property's visual connection to the highway is an important historic characteristic. Introduction of the Penn Avenue Station will interrupt this visual connection, as will redevelopment in the vicinity called for in station area plans.
 - Therefore, the Project will cause both direct and indirect effects on the property.
 - Kathryn pointed out that unlike the adverse effect finding for Wayman A.M.E. Church, which does not result from any physical incorporation of the historic property, a portion of the land included in the boundaries identified for the memorial will be used by the Project. This, coupled with the indirect effects, results in an adverse effect finding. This direct impact also triggers Section 4(f) of the Department of Transportation Act of 1966, under which DOT agencies cannot approve the use of land from historical sites (among other locations) unless there is no feasible and prudent alternative to the use of the land. The Project is currently exploring all alternatives to the use, and if an avoidance alternative is identified, that may become the preferred alternative, which would change this conversation significantly.
 - Jim asked if this could include eliminating a travel lane from Olson Memorial Highway, and Kathryn said it could not.
 - Jim shared concerns from the city that any change in design that would narrow the sidewalk to avoid use of this property will cause snow to pile up on the sidewalk and impede pedestrian access in this highly car-free, transit-reliant neighborhood. The city

- will put in writing that it disagrees with any proposed alternatives that would impede pedestrian access to the LRT and bus rapid transit (BRT) stations.
- Jim also noted that the argument that redevelopment could contribute to the adverse effect is interesting and nuanced. The city's plans call for development on this MnDOT-owned parcel anyway, so it seems like a stretch to say that LRT would cause the redevelopment.
 - Marcia Glick, City of Robbinsdale, asked if the statue could be moved as it was only moved to its current location in 1984.
 - Greg explained that the statue was originally located in the median. The statue is the historic feature, but the plaza space is an important aspect of its setting and, thus, is part of the historic property.
 - Kathryn referred back to the Section 4(f) discussion, noting that if an avoidance alternative is developed that avoids the adverse effect to the historic property and is practicable, the Project must adopt it.
 - Sarah explained further that while Section 106 stipulates the Project should try to avoid adverse effects, Section 4(f) requires avoidance.
 - Todd Larson, City of Brooklyn Park, asked if the City of Minneapolis or another entity wanted to install a sidewalk there would they encounter the same issue, and Kathryn answered that if they proposed to use federal funds, they would run up against the same requirements.
 - Paul Danielson, BPO, pointed out that the challenge is that the historic property's boundary extends to the curb. If it only extended to the back of the sidewalk, there would be no use of the historic property. Effectively, the Project is reconstructing the sidewalk in place, and since they have already narrowed lanes and pushed the road out, placing the sidewalk near the curb is the only way to avoid the historic property.
 - Jim said that the whole site is considered a historic property due to a subjective, professional decision, which now necessitates the Project avoid it. His view is that this original decision was an error; he does not see in the historical record that someone designed this plaza as a park. This is an important corner for pedestrians, and the city worked with the Project so that they would not have snow piled up on the corner.
 - Paul asked if there is flexibility to say that snow and pedestrian access is a greater impact than effects to the historic property. Sarah replied that FTA could bring the question to the ACHP, but MnHPO has already concurred on the boundaries identified by FTA as part of the Project. Greg added that after the boundaries were established in a previous wayside study, the property was examined as part of this Project to confirm it retains sufficient integrity.
 - Jim said that he does not recall there being a map with exact boundaries in the determination that the statue is eligible. The city would have raised an issue, knowing that redevelopment is being encouraged and that tree-lined boulevards and snow-free sidewalks are good for pedestrians and for North Minneapolis.
 - Marcia described that access to the statue on Victory Memorial Parkway is much easier and wondered if similar improvements could be made here.
 - Sarah said access is also better to the Leif Erikson statue along the METRO Green Line LRT. However, she again noted that Section 4(f) issues are more difficult to work through than Section 106 issues.
 - Scott Reed, BPO, suggested it might be worth having an offline conversation with FTA to confirm if 4(f) applies. This is a unique situation where the Project is using a portion of a historic property by slightly reconstructing the existing sidewalk, but the property is already within MnDOT right-

of-way (ROW) so it is not clear whether this would be considered converting the property to a transportation use per Section 4(f).

- Greg explained that since Section 4(f) is more stringent, the Project has to complete the analysis before effects can be resolved under Section 106.
- Sarah noted that the right design could avoid an adverse effect under Section 106.
- Greg explained that decisions are being made based on early designs to account for all possible effects. Jon Vimr, MnDOT CRU, noted that although the sidewalk is the Section 4(f) issue, the adverse effect finding is also based on additional visual effects.
- Jim reiterated that compliance with these requirements should not mean you get to a worse outcome.
- Greg indicated that the Project would resolve the Section 4(f) issues/questions and they could then return to the Section 106 discussion at the next consulting parties meeting.
- Scott said the Project has all the required information and will be having the conversation with FTA likely in the next week.
- Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District (Minneapolis, Golden Valley, Crystal, Robbinsdale, Brooklyn Park, Osseo)
 - The Project will be constructed within the BNSF-owned ROW along an approximately eight mile-long segment of the district, from TH 55 northwest to 73rd Avenue North in Brooklyn Park. The Draft EIS found no adverse effect, but design has since advanced, and BNSF has notified the Project that it will require physical separation between LRT and freight along the entirety of the segment. Project infrastructure and actions within the historic ROW will now include removal of historic track, a new alignment, two new LRT tracks, bridges, vertical circulation, fencing, the new corridor protection measures required by BNSF, and changes to the high voltage transmission lines (HVTLS). Therefore, an adverse effect determination has been made.
 - Todd said that when he tells people that this is the only historic property in Brooklyn Park affected by the Project, they are surprised since only the alignment is intact and no historic rail materials remain.
 - Greg briefly reviewed that in order to qualify for inclusion in the NRHP a property must possess significance under at least one of four criteria. The Osseo Branch is part of a historic district that is significant under Criterion A for Transportation for its association with the development of the potato farming industry in Osseo and surrounding areas. It established a connection that did not previously exist that allowed potato growers to access the national rail network, resulting in a significant expansion of the potato-growing industry.
 - Todd said this was a weak argument for historic significance.
 - Sarah and Jon countered that rail lines and associated agricultural industries were the primary reason for the development of communities like Brooklyn Park. Although the materials within the corridor have changed, historic railroads retain their integrity if their alignment and termini are intact.
 - Marcia mentioned the potential for mitigation measures such as interpretative train rides, and Sarah agreed, explaining that historic designation does not mean it has to be kept pristine but rather that effects must be minimized and mitigated.
 - Emily Goellner, City of Golden Valley, emphasized that the experience of approaching the track in Golden Valley will be totally different once the Project is in place (vegetation will be gone, etc.), but Todd pointed out that in Brooklyn Park, the highway dominates views and there is little vegetation.
 - Sarah said that in some states, railroads cannot be historic, while in other states all railroads are considered historic. MnHPO deals with this question all the time in their work on U.S. Army Corps of Engineers (USACE) projects related to wetlands.

- Jim asked how adding a train to a railroad corridor harms the historic property. Sarah said that previously MnHPO did not think it would since it follows relatively the same alignment; however, the more elaborate corridor protection measures with walls and ditches, and overhead elements, completely changes the setting.
 - Jim said that he could understand the historic designation if there were historic trestles or Works Progress Administration retaining walls. Since the track is modern, he asked if the adverse effect stems just from the scale of the intrusions.
 - Todd asked if BNSF would have the same constraints if they wanted to build a new track. Sarah replied that the railroad would not have to comply with the federal review process unless they sought federal money or a federal permit (like a USACE permit).
 - Greg emphasized that introduction of walls and grade separation will impact the naturalized setting, and Jon encouraged consulting parties to refer to the rendered cross sections to understand these impacts.
 - Referring to an image in the meeting presentation, Emily again explained that this view does not exist within three miles of any other major metropolitan area in the nation. Jim acknowledged that but pointed out that there is no historic infrastructure involved; it is just the introduction of new elements.
- Paul clarified that the Project has more definition since the Draft EIS. More advanced engineering shows the alignment moving 15 feet not 10 feet, larger retaining walls than previously assumed, more infrastructure in addition to the tree removal that would have had to happen regardless from property line to property line, and the introduction of corridor protection measures.
 - Greg pointed out that the rendered sections show this greater detail – larger scale structures, additional infrastructure in addition to the three parallel lines and vegetation clearing previously identified, physical separation of LRT and freight, and in particular more infrastructure south of N. 36th Ave. Paul pointed out that in the Brooklyn Park area, there will be a more significant bend in the line than previously thought.
- Todd asked if the adverse effect finding would stop the Project, and Sarah and Greg clarified that Section 106 does not stop projects, it simply requires consideration of minimization and mitigation measures.
- Sarah asked if Section 4(f) applies to this property too.
 - Scott said the Project looked at various alternatives as a part of a Section 4(f) analysis; while alternatives were found that were technically feasible, none were prudent options as they required the taking of numerous homes and were far more environmentally damaging.
- Grand Rounds Historic District, Theodore Wirth Segment (Minneapolis, Golden Valley)
 - An adverse effect finding has been made for this property due to alterations to two park entrances, numerous alterations to viewsheds and vistas, replacement of a bridge, and incorporation of two acres of the park into the Project.
 - Emily said that the City of Golden Valley agrees with the adverse effect finding and supporting rationale but has additional comments about mitigation. The city proposes interpretative signage in the park and at stations; vertical circulation using building materials common during the period of significance to reduce their impact; increasing vegetation at a more than one-to-one ratio; renaming Golden Valley Station to Theodore Wirth Station; and incorporating recreational considerations into the station design, for example through elevators that would accommodate bikes and skis.
 - Adam said he supports these proposals and in particular encourages station design that supports recreational access. The Grand Rounds has always been meant to be a recreational

corridor, so augmenting that recreational availability strengthens the historical link. Since the Grand Rounds is a complete bikeway, Adam emphasized that everything should be bike accessible, including access to the park and ride facilities. He echoes the mitigation ideas that focus on recreation, and said MPRB would have been surprised if this had not been an adverse effect call.

- Sarah cited two examples of related projects: MnHPO participated in developing a plan as part of the Southwest LRT project for managing the Kenilworth Lagoon, and with MPRB planners on the USACE permit for Basset Creek. It was difficult to come up with a plan for implementing quasi-natural elements like a creek or lagoon, and she assumes erosion control and ecological issues will come up during the BLRT Project as well.
 - Adam said that he has already discussed these issues with Michael Schroeder from MPRB.
- Paul said that since the elevators are designed with the capability to fit gurneys, he would assume skis would already fit.
- Adam emphasized that in addition to ensuring, for example, that skis physically fit, Project elements should be used to interpret the historical significance of recreational opportunities in the park.
- Homewood Residential Historic District (Minneapolis)
 - The Project will have minor direct physical effects on the district where an existing railroad crossing will be reconstructed and a retaining wall installed.
 - In addition, the visibility of Project elements and noise from Project operations will impact the district's setting.
 - Direct effects should be able to be addressed through design in accordance with the SOI's Standards, and noise mitigation could include interior testing and, if needed, retrofitting homes as has been done in order to mitigate airport noise.
 - Jim confirmed that this overview is consistent with the city's comments on the Draft EIS related to noise.
- West Broadway Ave. Residential Historic District (Robbinsdale)
 - The Project will run directly adjacent to the district on an elevated roadbed and approach structure for the bridge over Highway 100. Trains and associated infrastructure will be highly visible from the district, and viewsheds across the existing freight track will be blocked.
 - Operation of the Project and potential changes in traffic patterns in the district will also introduce noise. Implementation of quiet zones will eliminate severe auditory impacts on the district, but two residences would still have moderate impacts, so Project noise will adversely affect the historic district.
 - Marcia said that she is surprised views across the freight tracks are part of the assessment since the dense vegetation makes it difficult to see across the tracks currently. Greg explained that freight becomes more visible due to grade changes as you progress south. Marcia noted, however, that it seems likely the freight and LRT lines would merge together in the view.
 - Marcia also said that she thought the noise studies concluded that with noise barriers and wayside bells, no properties had remaining noise impacts except those impacted by the noise from Highway 100 near the north end of the district. Greg explained that the quiet zone elements address the severe auditory effects but that the Project still needs to minimize and mitigate moderate effects to two properties.
 - Greg added that the analysis of the views also takes into account the barriers that will add a vertical element, in addition to the tracks. Marcia pointed out that a lot of these elements are blocked by garages, and that the treatment along the alleys portrayed in renderings looks nice.

She asked whether BPO has done outreach on this topic, noting that the city has only heard from a few residents with large backyards.

- David Davies, BPO, responded that the Project has flyer for open houses but has not done outreach based on these specific details, which they plan to do after the municipal consent process is complete.

5) Next Steps

- Marcia asked when MnDOT CRU will finalize the placeholder appointments on consulting parties' calendars.
 - Greg said that once they receive comments following this meeting, they will finalize the schedule for the next consulting parties meeting, likely in late February or early March. Meetings will likely occur every two to four weeks after that point, and MnDOT CRU will inform consulting parties once those dates are finalized.
- Marcia asked for clarification on whether MnDOT CRU is requesting just broad comments or more detailed feedback.
 - Greg said that a phone call might work best for very minor comments on small details. In written comments, he is seeking feedback on FTA's findings of effect and on proposed mitigation measures.
- Jim asked whether the City of Minneapolis should comment on the GRHD, noting that they will have comments on the Plymouth Avenue Station but may defer to MPRB's comments on the GRHD.
 - Greg said that the city can comment on a topic they have an interest in.
 - Sarah said the city could note that since most impacts are in Golden Valley and within Theodore Wirth Regional Park, they are deferring to the City of Golden Valley and the MPRB.
 - Jim said he does not have strong opinions and would generally defer to the MPRB, but he will check with other staff.
- Greg asked for feedback on the proposal that for the residential historic districts with auditory impacts, the Project will install noise walls or implement quiet zones, and if auditory impacts remain, it will conduct testing and implement needed mitigation measures consistent with the SOI's Standards.
 - Consulting parties expressed general agreement that this is an acceptable approach.
 - Marcia asked if air conditioning can be installed in historic properties, and Sarah confirmed that this is done to mitigate airport noise around Lake Nokomis, in addition to retrofitting historic window frames.
- Greg also asked for feedback on stipulating design in accordance with the SOI's Standards and design review as minimization measures for Homewood Residential Historic District and GRHD.
- Marcia pointed out that for a few blocks along West Broadway Ave., the makeup of houses is quite variable. There are instances where LRT will pass five feet from a garage, and the home is across the alley from the district but identical to a historic home within the district.
 - Greg clarified that the district is the eligible property and that it contains both contributing and non-contributing properties. The ACHP encourages that a historic district be a cohesive unit with a tight boundary and no gerrymandering intrusions.
 - Sarah said there are volumes of surveys that detail each property, and in some cases there are small pieces of information that differentiate properties so that mitigation is required on one but not the other.
- Greg requested that consulting parties return comments on the Assessment of Effects report by February 19, 2016, preferably by email.
- Moving forward, he asked attendees to look forward to more regular consultation meetings as the draft MOA is developed over the coming months, noting that their input will allow for development of stipulations for avoidance, minimization, and mitigation.



METRO Blue Line LRT Extension (BLRT)

5514 West Broadway Avenue, Suite 200, Crystal, MN 55428 www.bluelineext.org

Meeting Title: Section 106 Consultation – Meeting No. 4

Date: Mar 10, 2016 **Time:** 1:30pm **Duration:** 2 hours

Location: Blue Line Project Office (BPO) – 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by: Greg Mathis – MnDOT CRU

Invitees: FTA: Reggie Arkell, Maya Sarna
MnHPO: Sarah Beimers
MnDOT CRU: Jon Vimr
Hennepin County: Dave Jaeger, Brent Rusco
City of Brooklyn Park: Emily Carr
City of Golden Valley: Emily Goellner
City of Minneapolis: Jim Voll
City of Robbinsdale: Marcia Glick
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Jenny Bring, Paul Danielson, Sophia Ginis, David Davies, Alicia Vap, Kelly Wilder

Discussion Notes

1) Welcome and Introductions

Jon Vimr, Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU), opened the meeting, led introductions, and described the agenda.

2) Project Updates

Jon provided a summary of comments received on the final determination of effect and related Project updates:

- The Minnesota Historic Preservation Office (MnHPO) concurred with all of FTA's findings presented at the February 4, 2016 consultation meeting.
- Comments received from other consulting parties since that meeting contained helpful minimization and mitigation recommendations that are assisting FTA and MnDOT CRU with their ongoing analyses concerning resolution of effects.
- MnDOT CRU and the Metro Transit Blue Line Project Office (BPO) also met with a neighborhood group in the Homewood neighborhood as part of public participation efforts under Section 106. The City is currently leading an effort to prepare a local landmark designation for the Homewood Residential Historic District.
 - Jim Voll, City of Minneapolis, shared that the meeting went well and that people generally agreed with the anticipated effects to the Homewood Residential Historic District.



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Jon then reviewed the steps in the Section 106 process, explaining that initiating the Section 106 process, identifying historic properties, and assessing adverse effects have been completed. FTA/MnDOT CRU are now in the process of resolving adverse effects, and they will soon move into development of a Section 106 Memorandum of Agreement (MOA).

- The regulations for implementing Section 106 require continued consultation to resolve adverse effects on historic properties, through consideration of measures to avoid, minimize, and mitigate adverse effects. These measures will be fulfilled under the MOA.
- Jon and Kathryn O'Brien, BPO, explained that the MOA is a legally binding agreement. An execution-ready version will be included in the Final Environmental Impact Statement (EIS), and the executed version will be included in the Record of Decision (ROD), anticipated to be published in August.
- Jon described the goals of the meeting as reviewing previously committed-to measures to minimize effects – and when possible avoid adverse effects – as well as considering alternatives for resolving unresolved adverse effects.

3) Resolved Properties

a) No adverse effect properties requiring implementation of MOA measures

Jon explained that the Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties report (determination of effect report) committed to avoidance measures for five properties: Sumner Branch Library, Labor Lyceum, Sacred Heart Catholic Church, Robbinsdale Water Works, and Hennepin County Library, Robbinsdale Branch.

b) Avoidance measures included in MOA to avoid adverse effects

Jon described measures to be included in the MOA to avoid adverse effects to the five properties above and to avoid and/or minimize effects to the remaining properties. These include designing project elements to the Secretary of the Interior's (SOI's) Standards, construction protection measures, and noise mitigation (under the National Environmental Policy Act [NEPA]) and noise minimization/avoidance (under Section 106).

Project Design

- Portions of the Project within and near historic properties will be designed in accordance with the SOI's Standards to minimize effects and help to avoid adverse effects.
- Design review will occur as Project design advances through 30%, 60%, 90%, and 100% plans. This review will ensure design is complying with the SOI's Standards and will identify substantive changes that could result in a chance of effect.
- Jon pointed out that at the last meeting, Sarah Beimers, MnHPO, asked for clarification on what it means to say that measures will be implemented "within the vicinity of a historic property," i.e., within what distance of historic properties will Project elements be subject to designing to the SOI's Standards.
 - Jon explained that one option would be to define a distance, and any Project elements within that distance to a historic property would be reviewed. However, FTA/MnDOT CRU instead proposes that this vicinity covers larger portions of the corridor encompassing relevant historic properties.
 - For example, in Minneapolis and Golden Valley, Project elements that would be designed to the SOI's Standards include those roughly from Bryant Avenue North just west of I-94 to just north of Theodore Wirth Regional Park (TWRP).



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- In Robbinsdale, Project elements would be designed to the SOI's Standards within the portion of the corridor from south of the Sacred Heart Catholic Church to just north of the bridge over Highway 100.
- Kathryn and Caroline Miller, BPO, asked for clarification regarding the extent of the corridor within these areas where designing to the SOI's Standards would be required, and Greg Mathis, MnDOT CRU, clarified that they would include the extent of the construction limits.
- Jon explained that the SOI's Standards when applied for something like this generally do not require major changes and that Project needs will still be able to be met.
- Caroline asked for clarification about which properties these requirements would apply to, and Greg responded that the SOI's Standards would be required to avoid and minimize visual effects to Sumner Branch Library, Labor Lyceum, Floyd B. Olson Memorial, and the Theodore Wirth Segment of the Grand Rounds Historic District.
- Jim asked if all Project elements would be reviewed to the SOI's Standards.
 - Greg described that the SOI's Standards require compatibility with historic properties but are very broad in order to encompass all property types. They require considerations of scale, patterns, and use of compatible materials to avoid diminishing the character of historic properties. For example, the Sumner Branch Library is a Tudor Revival style building, so flashing neon lights and 80-foot tall Project elements would not be allowed. For TWRP, Project elements should be compatible with its character but different enough so that it is clear they are not mimicking the characteristics of the historic property.
- Kathryn asked how the SOI's Standards accommodate Americans with Disabilities Act (ADA) compliance, safety, and security.
 - Greg responded that the SOI's Standards call for holistic design that can accommodate these Project needs, and Sarah further clarified that they allow for modifications to account for ADA accessibility, safety, and security, for example those that were necessary near churches and in downtown St. Paul during development of the METRO Green Line LRT project.
- Jim pointed out that it makes sense to adopt the SOI's Standards comprehensively along the Project alignment in Minneapolis and near TWRP. Although the Golden Valley Road Station is not in Minneapolis, their neighborhoods still have concerns. Jim continued that trees and landscaping are important to residents, and the city does not want trees removed and not replaced because they are not historically accurate (as happened in the Minneapolis Warehouse District).
 - Greg indicated that more conversation would occur about how the SOI's Standards are implemented specific to each property.
- Paul Danielson, BPO, asked what the SOI's Standards mean for the bridges north of Golden Valley Road, for example over Golden Valley Pond, or the Highway 100 crossing where the Project is planning to match the current bridges.
 - Jon replied that since those bridges are not historic, they do not need to meet the SOI's Standards. Paul asked whether what MnDOT CRU has seen so far of Project design in this area would meet the SOI's Standards, and Greg and Jon clarified it would.

Construction Protection Plan

- Jon described that construction protection measures are needed for properties in close proximity to the Project, or for properties that share a border with or are infringed upon by the Project.



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- Vibration monitoring and remediation measures (VMRMs) may be applicable to some properties. These measures will likely dictate monitoring thresholds, property owner notification, and damage remediation. However, vibration damage is unlikely, as evidenced by results of the Noise and Vibration Effects on Historic and Cultural Resources technical memorandum prepared by the Project.
- Caroline pointed out that the Project did not identify any vibration-sensitive properties per FTA noise and vibration guidelines.
 - Greg clarified that these measures address vibration from construction rather than Project operations as analyzed during the studies for the Project. He referred attendees to a handout listing avoidance/minimization/mitigation measures for inclusion in the MOA to determine for which properties VMRMs are applicable.
 - Jon said that utilization of these measures is similar to that of the Southwest LRT project.
- Greg continued that as Project design advances, development of construction protection plans will allow the Project to determine vibration thresholds, plan fencing locations, and consider other protections for historic properties.
- Jon concluded by pointing out that ground-disturbing activities always hold the risk for unexpected archaeological discoveries. Depending on the find, construction would halt, and consultation would resume among relevant parties as defined in the MOA.

4) Proposals for Addressing Unresolved Effects

Jon explained that adverse effects to six properties remain unresolved. The discussion today will focus on resolving effects to Wayman A.M.E. Church, Homewood Residential Historic District, West Broadway Avenue Residential Historic District, and Osseo Branch. The two remaining properties – Floyd B. Olson Memorial and Grand Rounds Historic District – will be discussed at upcoming meetings.

a) Wayman A.M.E. Church

- Jon described that the church is located in an area that Station Area Planning (SAP) identifies for a mixed-use commercial node with medium- to high-density development.
- Jon acknowledged comments by the City of Minneapolis that they already recognize the property as historic and identify the area for redevelopment even without the Project; however, based on the fact that the Project is early in the design process and that SAP completed for the project indicates a land use incompatible with the historic structure, FTA/MnDOT CRU made a conservative determination that the Project will have an adverse effect on the property.
- The Project is proposing to prepare nominations for this property for listing in the National Register of Historic Places (NRHP) and as a local landmark. Jon clarified that the Project cannot guarantee successful listing on the NRHP, but can commit to preparing the nominations to appropriate standards.
 - Kathryn asked if the City must be a signatory for the Project to prepare a local designation. Greg responded that they do not and that the two forms the Project would prepare are very similar.
 - Jim confirmed that the City supports preparation of an NRHP nomination form and he will confirm if local designation is desired as well. He said the City could fund or complete any additional work it would take to prepare the local form, if needed.
 - Kathryn responded that since it is not much extra work, the Project can prepare both forms. If the City is not certain whether they want both forms prepared, the MOA could state that the Project will prepare the NRHP form and work with the City to determine how to handle the local designation.



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- Jon pointed out that NRHP designation requires property owner consent. Sophia Ginis, BPO, said she would have to confirm the property owner's stance since she did not specifically ask during previous communications, but it is likely they would be agreeable to NRHP designation. Jim clarified that local designation does not require property owner consent, although he would certainly prefer to have it.
- Sarah said that she is hopeful that these strategies will successfully avoid or minimize the Project's effects on this property, since that is the ultimate goal of the Section 106 process.

b) **Homewood Residential Historic District**

- Jon explained that a small portion of the district will be directly impacted by the Project reconstructing less than 500 feet of street at Xerxes Avenue and Oak Park Avenue. Indirect effects considered include the following.
 - Visual effects from Project infrastructure:
 - Tracks, catenary, TPSS, etc. from LRT and freight bridge alignment.
 - New Plymouth Avenue bridge and associated station and vertical circulation tower.
 - High voltage transmission line replacement.
 - Vegetation removal.
 - Auditory effects from operations of light rail vehicles and Plymouth Station.
 - Effects from potential future redevelopment were considered but found to be negligible.
- The adverse effect finding for the district is due to a moderate noise impact on three residences at the southwest corner of the district.
- Jon clarified that the vertical circulation elements are only visible from a few properties, and Kathryn reiterated that the noise impacts are moderate rather than severe.
- Jon described the measures proposed to minimize effects and avoid non-auditory adverse effects, including designing Project elements in accordance with the SOI's Standards and implementing a construction protection plan.
- To mitigate the auditory adverse effect, the Project proposes interior testing for the three affected properties and installation of sound insulation if there are impacts. Any insulation efforts would meet the SOI's Standards and be reviewed by MnHPO.
- Kathryn said that these commitments are consistent with Metropolitan Council noise policies and similar to commitments the Project is making to other properties that will experience moderate noise effects.
- Jon said that a noise wall would have visual effects, so these measures are preferable from a Section 106 perspective.
- Sophia said that during a meeting with neighborhood residents on March 7, 2016, residents informed the Project that illegal track crossings take place currently. Jim said the City is aware of this, which is why they worked with the Project to include a sidewalk on the Highway 55 bridge to encourage people to cross safely.
 - Jon added that at the meeting residents indicated an interest in being involved in developing the design of the Project elements, particularly a fence at the intersection of Xerxes and Oak Park Avenues.
 - Kathryn pointed out that residents will continue to be involved as the design moves forward, particularly as details for the fence, which will be located within Project right of way to keep people off the tracks, are further developed in the 30% and 60% design plans.



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- Paul said that there are some Construction Code standards that dictate specific design features of the fence, such as height, etc.
- Greg asked Jim if the City would prefer consultation meetings be scheduled in order to conduct benchmark reviews.
 - Jim said the City is comfortable with noise testing, although residents around the Plymouth Avenue Station are concerned about being left behind if Golden Valley residents and the Minneapolis Park and Recreation Board have more say.
 - Greg asked if the design review benchmarks would present an opportunity to re-engage the neighborhoods. Sophia clarified that similarly to past meetings, the Project will include Section 106 information on meeting agendas and invite Greg to attend as a resource.
 - Alicia Vap, BPO, said the Project will need to engage residents as part of the Golden Valley permitting process, but they generally have not been as concerned as Minneapolis residents, since the majority of residents in the vicinity are located in Minneapolis.
 - Greg and Jon clarified that this outreach would take place in addition to implementation of the SOI's Standards. Jim described that the residents interested in the historic district are distinct from the main neighborhood organization, so the City will need to do additional outreach outside of Section 106.
 - Sophia explained that residents also become involved through their block clubs, but are not all within one neighborhood group.

c) West Broadway Avenue Residential Historic District

- Jon explained that no direct effects were considered for this property; however, indirect effects considered include the following.
 - Visual effects from Project infrastructure:
 - Elevated guideway, tracks, catenary, new bridge over Highway 100, etc. from LRT and freight rail alignment.
 - Vegetation removal.
 - Auditory effects from operations of light rail vehicles and crossings.
 - Potential future redevelopment catalyzed by the Project.
- With implementation of a quiet zone, the adverse effect finding for the district is due to a moderate noise impact on two residences.
- Jon described the measures proposed to minimize effects and avoid non-auditory adverse effects, including designing Project elements in accordance with the SOI's Standards and implementing a construction protection plan.
- To mitigate the auditory adverse effect, the Project proposes implementation of a quiet zone at the 42nd Avenue North crossing as well as interior testing for the two properties with potential moderate impacts and installation of sound insulation if there are impacts. As with Homewood, any insulation efforts would meet the SOI's Standards and be reviewed by MnHPO.
- Marcia Glick, City of Robbinsdale, asked whether there will be a noise wall. Kathryn explained that based on preliminary plans, a noise wall would not meet the cost effective criteria, so the decision was made to do interior testing instead.



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- Marcia noted that it is questionable to have a noise wall along the rest of the alignment through Robbinsdale but not at historic properties. In addition, residents are concerned that riders will be passing by on the elevated LRT line and looking into their homes from above.
- Kathryn said that the design consultant will continue to consider the noise wall but that currently, the Project does not think it is the best choice. If that changes, the noise wall would be subject to design review to the SOI's Standards, like other Project elements in the vicinity.
- Marcia said that other types of visual screens should be considered to address the need to block views from the passing trains, although residents should be consulted on their perspectives.
- Greg asked if the City of Robbinsdale would conduct that outreach or whether the Project should.
 - Marcia said the City would have to do its own outreach at some point.
 - Alicia noted that this area is not unique in Robbinsdale. There are many areas where the Project is very close to homes, and outreach will continue with these residents as Project development moves forward.

d) Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District

- The Project uses an approximately eight-mile segment of the 13-mile corridor.
- Jon explained that although there are differing opinions, FTA/MnDOT CRU contends – and the Project agrees – that this property will no longer retain its historic integrity so will no longer be an historic property with implementation of the Project. There is little that could be done to avoid or minimize the adverse effect, so instead, the Project is proposing mitigation through documenting other historic railroads.
 - Phase II documentation will be conducted of other railroads that are either not yet documented or documented in insufficient detail. This will include making an eligibility recommendation as well as defining boundaries for the historic property. The goal will be to provide a greater level of detail than simply indicating an entire railroad line, which may be hundreds of miles long, is eligible.
 - Kathryn explained that this is analogous to what was done for the METRO Green Line LRT project when a demolition was necessary. Greg agreed, confirming that detailed recordation would not contribute to a greater understanding of the resource since its story, rather than its engineering or other physical aspects, is what is significant and already well documented.
 - Sarah pointed out that this type of documentation may be useful for the St. Paul, Minneapolis & Manitoba main line, which often overlaps with other projects.
 - Sarah added, however, that interpretation may also be beneficial to creatively tell the story of the Osseo Branch Line's role in the potato industry, noting that at a previous meeting, Todd Larson at City of Brooklyn Park remarked that even his city's residents do not understand the significance of the resource.
 - Kathryn asked consulting parties whether the MOA stipulation regarding interpretation can remain broad or whether it needs to be more specifically defined. Sarah recommended including parameters in the MOA for development of an interpretive plan that will be prepared later, but include enough specifics that everyone generally understands the scope or type of interpretation.



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- Alicia recommended including that community involvement will be incorporated into the interpretive planning.
- Kathryn similarly noted that involvement from internal Metropolitan Council stakeholders will be important to ensure any built structures align with the Project.
- Marcia said that for the City of Robbinsdale, the story is more about the founders of the city using the rail line and deciding to build the city based on the area's lakes. The historical depot was located where the Robbinsdale Station will be located, which first served the railroad and later the streetcar.
- Greg asked attendees whether they favor physical interpretation, development of information for publication, or other interpretation options.
 - Alicia noted that the plaza planned for between the station and the park and ride in Robbinsdale would provide an opportunity for some form of interpretation.
 - Paul cautioned that on-train interpretation would likely not be feasible since Metro Transit uses light rail vehicles across the entire system, not specific to each line.
 - Paul suggested that some of the five stations located along the Osseo Branch Line may be more conducive than others to hosting interpretation, and Alicia suggested that the 63rd Avenue and Robbinsdale Avenue stations may be good options.
- Greg and Jon noted that consulting parties seem to be in general agreement with this mitigation strategy and invited further comments to inform parameters in the MOA.

5) **Next Steps**

Jon described that the two remaining properties – Floyd B. Olson Memorial and Grand Rounds Historic District – will be discussed at upcoming meetings.

- The Cities of Minneapolis and Golden Valley should participate in those discussions, but all interested parties are welcome, and MnDOT CRU can then decide whether additional meetings are necessary.
- Greg confirmed that consulting parties are generally in agreement with the proposals for resolving effects for properties presented to date, so MnDOT CRU will begin drafting the MOA based on the discussion.
- Marcia requested that placeholders and invitations for future meetings contain a general agenda so that participants can assess whether they need to attend.
- Jim said that Jack Byers from the City of Minneapolis would like to attend the meeting when Floyd B. Olson Memorial is discussed, so he requested that MnDOT CRU call ahead to check his schedule.



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Meeting Title: Section 106 Consultation – Meeting No. 5

Date: Mar 24, 2016 **Time:** 1:30pm **Duration:** 2 hours

Location: Blue Line Project Office (BPO) – 5514 West Broadway Avenue, Suite 200, Crystal, MN 55428

Conference Room 2

Meeting called by: Greg Mathis – MnDOT CRU

Invitees: FTA: Reggie Arkell, Maya Sarna
MnHPO: Sarah Beimers
MnDOT CRU: Jon Vimr
Hennepin County: Brent Rusco
City of Golden Valley: Emily Goellner
City of Minneapolis: Jim Voll, Jack Byers
Minneapolis Park & Recreation Board: Adam Arvidson
Metro Transit, BPO: Kathryn O'Brien, Caroline Miller, Shelley Miller, Tom Harrington, Paul Danielson, Sophia Ginis, David Davies, Alicia Vap, Lee Williams, Kelly Wilder

Discussion Notes

1) Welcome and Introductions

Greg Mathis (Minnesota Department of Transportation [MnDOT] Cultural Resources Unit [CRU]), opened the meeting and led introductions.

2) Project Updates

Greg reminded consulting parties that FTA issued its Final Determination of Effect (DOE) on historic properties and submitted it to the Minnesota Historic Preservation Office (MnHPO) in January 2016.

- FTA found the METRO Blue Line LRT Extension (Project) will have an adverse effect on six properties, no adverse effect on six properties, and no adverse effect on five properties with implementation of measures in the Section 106 Memorandum of Agreement (MOA).
- At the March 10, 2016 consultation meeting, parties reviewed various MOA stipulations and developed mitigation ideas to resolve adverse effects on all but two historic properties affected by the Project. Finer details and language on these ideas is currently being developed.
- Adverse effects to the two remaining properties – Floyd B. Olson Memorial and Grand Rounds Historic District – are the focus of this meeting.
- Greg reviewed the Section 106 process, explaining that initiating the Section 106 process, identifying historic properties, and assessing adverse effects have been completed. FTA/MnDOT CRU are now in the process of resolving adverse effects and developing the MOA.



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3) Grand Rounds Historic District, Theodore Wirth Segment

a) Measures to resolve adverse effects

Greg reminded attendees of the Project's location within Theodore Wirth Regional Park and its direct and visual effects as described in the Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties report.

Greg noted that consulting parties have previously discussed designing Project elements in accordance with the Secretary of the Interior's (SOI's) Standards as well as developing construction protection plans for work in the vicinity of historic properties. He asked for feedback from consulting parties on what measures should be implemented for the portion of the Project within the park. Emily Goellner (City of Golden Valley) reiterated the requests contained in her letter dated February 19, 2016. Emily, Greg, Adam Arvidson (Minneapolis Park and Recreation Board [MPRB]), Jim Voll (City of Minneapolis), and BPO staff discussed various options summarized below:

Preservation/Treatment Plans

- Adam also suggests a preservation plan and treatment plan/standards/guidelines similar to what is stipulated in the Southwest LRT project MOA for the Kenilworth Segment of the Grand Rounds Historic District (GRHD).
 - Greg, Sarah Beimers (MnHPO), and Kathryn O'Brien (BPO) discussed details of these planning efforts. A preservation plan would guide policy and master planning decisions, while a treatment plan would identify historic features and outline day-to-day maintenance and treatment activities. It is logical to prepare these plans for separate segments of the GRHD since their National Register nomination forms focus on each segment's individual themes. The plans will be developed collaboratively so will benefit MPRB, Metropolitan Council, and MnHPO, and they will serve as a model for future federal projects that impact MPRB resources.

Project Design and Consultation

- Adam emphasized the importance of a trailhead facility at the Golden Valley Station park-and-ride. The vegetated buffer between the park-and-ride and the parkway and trail facilitates is important mitigation.
 - Emily asked if this vegetation can be replaced at a greater than one-to-one ratio, to maintain viewsheds as defined in the landscape study. Kathryn and Alicia Vap (SPO) said that vegetation must be cleared along the 100-foot BNSF corridor for safety but that the Final Environmental Impact Statement (EIS) reflects the Project's commitment to replacing impacted vegetation, and that plantings may be able to be focused to screen key views toward the Project.
 - Alicia noted that if the park-and-ride does not advance through Project design, the trailhead will not advance, and Kathryn asked that the MOA make this clear.
- Emily asked that the material and finish of the retaining and crash walls reflect the surrounding historical features, and Adam emphasized the importance of the design of walls that face the park. Kathryn and Paul Danielson (BPO) discussed the safety requirements necessitating the use of concrete walls and glass vertical circulation facilities. Sarah explained that the SOI's Standards accommodate merging Project needs with historical considerations, and Tom Harrington (BPO) explained the Project is looking into these options.



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- Kathryn, Alicia, and Sarah noted that the MOA will simply stipulate design in accordance with the SOI's Standards. However, ongoing design resolution team (DRT) meetings can offer a venue for continuing these conversations, including involvement by MnHPO's historical architect.
- Emily and Adam discussed the importance of recreational amenities connecting to the Project, and Sarah agreed that recreation is a historically significant facet of the park. Project staff explained that station design should accommodate recreational needs (e.g., elevators tall enough to fit skis, ski racks, bike runnels, etc.).

Interpretation

- Jim is not opposed to renaming Plymouth Avenue Station but would like to remain involved in the decision-making.
- Emily and Adam described that wayfinding and signage should highlight the history of the park and Theodore Wirth himself. It should sufficiently highlight these important stories while not interfering with the park's resources and the visitor experience. The MOA should leave flexibility for further development of these plans.
- Adam encouraged interpretation of the 45th Parallel Boulder, since the 45th parallel bisects the station. This is something that has been discussed at DRT meetings.

Greg summarized that the MOA will contain language to enable the above topics to be addressed through the DRT process, rather than including any specifics that could force the Project to implement a solution that turns out not to be advisable. In addition, the MOA will mirror the Southwest LRT project MOA for consistency among segments of the GRHD. Adam and Emily confirmed this is an acceptable approach and requested a DRT schedule to plan for who should attend relevant meetings.

4) Floyd B. Olson Memorial Statue

a) Boundaries

Greg explained that as the property owner, MnDOT reviewed its documentation of the statue's original site before it was moved in 1984 and found that the current site is much larger and does not reflect the original site design. Therefore, they have recommended the National Register boundaries be revised to include only the statue and its pedestal.

- Greg explained that Project elements no longer infringe on the historic property so there is no direct adverse effect. However, FTA's adverse effect finding remains in effect due to the potential for indirect effects from visually prominent Project elements and redevelopment anticipated by Station Area Planning (SAP).
- Sarah received MnDOT's request to reevaluate the resource's boundaries and confirmed she concurs with the revised boundaries and that there are no direct effects. Written concurrence is forthcoming.
- Greg, Sarah, and Kathryn will discuss what documentation among FTA/MnDOT CRU and MnHPO will be necessary to account for the revised boundaries in Project planning. Kathryn noted that FTA is planning to issue an amended Section 4(f) evaluation in the coming weeks based on the revised boundary.

b) Measures to resolve adverse effects

Greg asked City of Minneapolis and Hennepin County staff if the revised boundaries resolve their previous concerns. Jim and Brent Rusco (Hennepin County) confirmed it resolves concerns related to pedestrian access;



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however, Jim said it does not resolve the fact that the city disagrees with the assessment that redevelopment could adversely affect the statue.

- Greg and Jon Vimr (MnDOT CRU) reiterated that FTA/MnDOT CRU based the adverse effects finding on the reasonably foreseeable cumulative effects from redevelopment anticipated by SAP efforts.
- Jack Byers (City of Minneapolis) and Jim reiterated their perspective that there can be no adverse effect finding since the statue has been moved so does not retain its intended location, feeling, or setting. In addition, SAP incorporates open space that could accommodate the statue.
- City staff discussed with Sarah that National Register Criteria Consideration B: Moved Properties could allow for development of a plan to move the statue to a more historically appropriate site. The plan could delineate appropriate boundaries and inform orientation, landscaping, and site design to preserve the statue's remaining integrity.
- Greg agreed that a treatment plan for the property is a promising idea for mitigation; however, he and Sarah discussed the need to confirm an approach with FTA to ensure the Project will not inadvertently exacerbate the current adverse effect through moving the property again. In addition, they discussed the benefits of preparing a National Register nomination for the property.
- Paul confirmed that there is adequate time to determine a plan for the site before landscaping is finalized in the 60% designs in 2017.
- Greg will follow up internally at MnDOT, the current property owner, on whether the agency would support preparation of a National Register nomination.

5) **Next Steps**

Greg summarized that FTA/MnDOT CRU will draft the MOA in the coming weeks and circulate it for review by consulting parties. There will then be another meeting to review the draft, and it will be finalized in time for inclusion in the Final EIS, anticipated to be published in June. Kathryn explained that consulting parties wishing to sign the MOA will do so between its publication in the Final EIS and release of the Record of Decision in August.



Appendix H

Section 106 Supporting Materials

H.4 Other Supporting Documents

1. Federal Transit Administration, *METRO Blue Line Extension Light Rail Transit Project Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties (DOE Report)*, January 20, 2016.
2. The 106 Group Ltd, *Theodore Wirth Regional Park Cultural Landscape Study for the Blue Line Extension LRT Project*, September 2015.
3. The 106 Group Ltd, *Phase I and II Architectural History Survey for the Bottineau Transitway Project, Crystal, Brooklyn Park, Golden Valley, Maple Grove, Minneapolis, New Hope, and Robbinsdale, Hennepin County, Minnesota (Volume 1 and 2)*, 2012. Available at <http://metro council.org/Transportation/Projects/Current-Projects/METRO-Blue-Line-Extension/Environmental/Technical-Reports.aspx>.
4. The 106 Group Ltd, *Phase IA Archaeological Assessment for the Bottineau Transitway Project, Hennepin County, Minnesota*, 2012. This report is available by request.
5. The 106 Group Ltd, *Bottineau Transitway Phase I and II Architectural Survey, Hennepin County, Minnesota: Supplemental Report 1*, 2013. Available at Available at <http://metro council.org/Transportation/Projects/Current-Projects/METRO-Blue-Line-Extension/Environmental/Technical-Reports.aspx>.
6. Federal Transit Administration and Minnesota State Historic Preservation Office, *Section 106 Programmatic Agreement Between the Federal Transit Administration and the Minnesota State Historic Preservation Office Regarding the Construction of the Interchange Project Minneapolis, Minnesota*, 2012.



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METRO Blue Line Extension Light Rail Transit Project

Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties

January 2016



Prepared by

The Minnesota Department of Transportation
Cultural Resources Unit
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Summary

The METRO Blue Line Extension Light Rail Transit (LRT) Project (Project), previously known as the Bottineau Transitway, is an approximately 13-mile long LRT line with 12 stations (one [1] existing, 11 new), five (5) park-and-ride facilities, and one (1) operations and maintenance facility, located in Hennepin County, Minnesota. The line will begin at the existing Target Field Station in Minneapolis, where it will connect with the existing METRO Blue and Green LRT lines, and the Northstar Commuter Rail line. From the Target Field Station, the Project will extend along a northwesterly alignment, connecting the cities of Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park.

The Metropolitan Council (Council) is intending to apply for Federal Transit Administration (FTA) funding for the Project and is intending to seek permits for construction from the United States Army Corps of Engineers; therefore, the Project is a federal undertaking and must comply with Section 306108 of the National Historic Preservation Act of 1966, as amended (54 United States Code [U.S.C.] § 306108) and its implementing regulations, 36 Code of Federal Regulations § 800 et. seq.; Section 101(b)(4) of the National Environmental Policy Act of 1969, as amended, (42 U.S.C. § 4331); and other applicable federal mandates. The Project is also using funding from the State of Minnesota and political subdivisions of the State and is seeking permits for construction from several state agencies, including Minnesota Department of Transportation, Minnesota Department of Natural Resources, Minnesota Pollution Control Agency, and Minnesota Department of Health. It must also, therefore, comply with Minnesota laws, including the Minnesota Environmental Policy Act of 1973, the Minnesota Field Archaeology Act (Minnesota Statute [MS] § 138.31-138.42), the Minnesota Historic Sites Act (MS § 138.661-138.669), and the Minnesota Private Cemeteries Act (MS § 307.08), as applicable. This assessment of effects study was prepared to comply with these legislative requirements.

This report describes the proposed Project; its Area of Potential Effect (APE); efforts to identify and evaluate historic properties within the Project's APE to determine their eligibility for listing on the National Register of Historic Places; and evaluates the Project's effects on those properties. Based on findings of the effects assessments, the Project will have an adverse effect on six (6) historic properties: the Wayman African Episcopal Methodist Church; Floyd B. Olson Memorial Statue; Grand Rounds Historic District; Homewood Residential Historic District; the Osseo Branch of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District; and the West Broadway Avenue Residential Historic District. Due to the adverse effect the Project will have on these properties, FTA has determined that the undertaking will have an Adverse Effect on historic properties.

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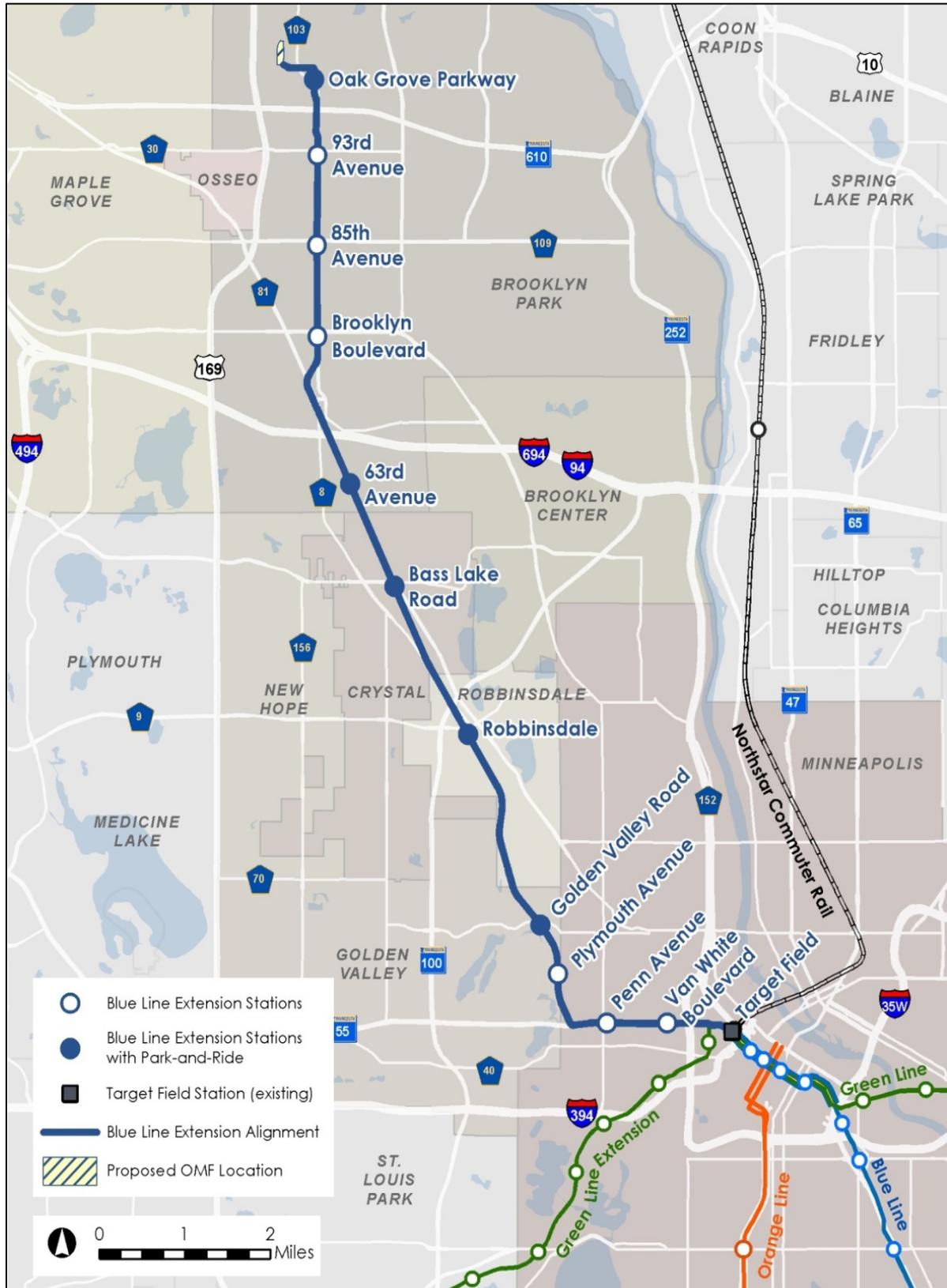
Section 1: Introduction

The proposed METRO Blue Line Extension Light Rail Transit (LRT) Project (Project), previously known as the Bottineau Transitway, is an approximately 13-mile long, double track LRT located in Hennepin County, Minnesota. The line will begin at the existing Target Field Station (previously known as the Interchange Station) in Minneapolis, where it will connect with the existing METRO Blue and Green LRT lines, and the Northstar Commuter Rail line, and extend along a northwesterly alignment, to connect the cities of Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park. The Project includes 11 new stations, five (5) park-and-ride facilities (four to be constructed as part of the Project and one that currently exists and will be used to serve the Project), and one (1) operations and maintenance facility (OMF) (Figure 1).

The Project was initiated by the Hennepin County Regional Railroad Authority (HCRRA), which completed an Alternatives Analysis for the Project in March 2010. In June 2012, the HCRRA identified a Locally Preferred Alternative (LPA) that included a preferred alignment, with LRT as the preferred mode of transit. The Metropolitan Council (Council) adopted the LPA as part of its *2030 Transportation Policy Plan* in March 2013. The HCRRA, in joint local partnership with the Council, and with the Federal Transit Administration (FTA) as the federal sponsor, subsequently completed and published a Draft Environmental Impact Statement (DEIS) for the Project in March 2014. Upon receipt of the FTA's approval to enter the New Starts Program, Governor Dayton identified the Council as the agency with responsibility to advance and, potentially, to construct and operate the Project. The Council will be the sole local Project sponsor preparing the Final Environmental Impact Statement (FEIS), with the FTA as the federal Project sponsor. The Council anticipates that completion of preliminary design and engineering in addition to publishing of the FEIS will occur in 2016.

The Council intends to apply for FTA funding for the Project and intends to seek permits for construction from the United States Army Corps of Engineers (USACE); therefore, the Project is a federal undertaking and must comply with Section 306108 of the National Historic Preservation Act of 1966 (NHPA), as amended (54 United States Code [U.S.C.] § 306108) (hereinafter referred to as Section 106) and its implementing regulations, 36 Code of Federal Regulations (CFR) § 800 et. seq.; Section 101(b)(4) of the National Environmental Policy Act of 1969 (NEPA), as amended, (42 U.S.C. § 4331); and other applicable federal mandates. The Project will also use funding from the State of Minnesota and political subdivisions of the State, and is seeking permits for construction from several state agencies. Therefore, it must also comply with Minnesota laws, including the Minnesota Environmental Policy Act of 1973, the Minnesota Field Archaeology Act (Minnesota Statute [MS] § 138.31-138.42), the Minnesota Historic Sites Act (MS § 138.661-138.669), and the Minnesota Private Cemeteries Act (MS 307.08), as applicable. This assessment of effects study was prepared to comply with the aforementioned legislative requirements.

Figure 1. Project Location



Pursuant to 36 CFR § 800.2(a)(2), the USACE has recognized FTA as the lead Federal agency responsible for fulfilling their collective Section 106 obligations for the Project.¹ FTA has delegated authority to the MnDOT Cultural Resources Unit (CRU) to aid FTA in many aspects of the Section 106 process for the Project per 36 CFR § 800.2(a)(3).² Authority delegated includes: initiating the Section 106 process; identifying an Area of Potential Effect (APE); conducting appropriate inventories to identify historic properties within the APE; making determinations of eligibility for the National Register of Historic Places (NRHP); making assessments of potential effect; and conducting consultation with the Minnesota State Historic Preservation Office (MnSHPO), interested parties, and the public. MnDOT CRU is also assisting FTA with identifying consulting parties, making determinations of effect and negotiating the terms and conditions of the Memorandum of Agreement (MOA) for the Project, although FTA retains final authority in these areas.

This report provides a summary description of the LPA, an overview of the legal and regulatory requirements for Section 106, a summary of the results of efforts completed to date to identify and evaluate historic properties for the NRHP that could be potentially affected by the Project, and describes consultation completed with interested parties and the public to consider Project effects on historic properties. It also assesses effects of the Project on NRHP listed and eligible properties located within the APE, provides findings of effect for each property, and describes FTA's final determination of effect on historic properties for this undertaking.

¹ In a letter dated March 30, 2015, the USACE recognized FTA as the Lead Federal Agency pursuant to 36 CFR § 800.2(a)(2), to act on its behalf for meeting the requirements of Section 106.

² FTA delegated authority to MnDOT CRU in a letter dated February 16, 2011.

Section 2: Project Description

The proposed Project is an approximately 13-mile long, double track LRT line with 11 new stations; four (4) new park-and-ride facilities with approximately 1,670 spaces (an existing park-and-ride with 565 spaces will also be used to serve the Project); one (1) OMF; accommodations for passenger drop-off; pedestrian and bicycle access; roadway, streetscape, and landscape improvements; and restructured local bus route connections located in Hennepin County, Minnesota. The line will begin at the existing Target Field Station in Minneapolis, where it will connect with the existing METRO Blue and Green LRT lines, and the Northstar Commuter Rail line. From the Target Field Station, the line will extend along a northwesterly alignment to connect the cities of Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park. The Project also includes alterations to a freight railroad line corridor that the LRT alignment will utilize for a portion of its length. A more detailed description of Project elements is included below.

Geographic Area and Light Rail Alignment

The Project begins at Target Field Station in downtown Minneapolis and follows Olson Memorial Highway (Trunk Highway [TH] 55) west to the Burlington Northern Santa Fe (BNSF) Railway (Rwy.) corridor (historically known as the Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad [StPM&M RR] / Great Northern [GN] Rwy.) just west of Thomas Avenue where it enters the BNSF Rwy. right-of-way (ROW). Adjacent to the freight rail tracks, it continues in the railroad corridor through the cities of Golden Valley, Robbinsdale, Crystal, and into Brooklyn Park. It then crosses Bottineau Boulevard (CR 81) at 73rd Avenue to West Broadway Avenue and terminates just north of TH 610 near the Target North Campus (see Figure 1).

Track Structure

The Project will operate on standard-gauge rail. The proposed system will be double-tracked throughout to provide separate tracks for northbound and southbound trains. Crossovers to allow trains to cross from the northbound to the southbound tracks will be provided at regular intervals for special operations or emergencies. Typically, the guideway in the BNSF Rwy. corridor will be ballasted track, separate from the freight rail track. Track at station areas will consist of direct fixation track. When running on alignments in streets the majority of the Project will be ballasted track, with embedded or direct fixation track provided depending on the location and the context of the street.

Overhead Power System

Overhead Power Systems will transmit electrical power from a Traction Power Substation (TPSS) to the light rail vehicle via a pantograph system that will be constructed along the entire Project ROW.

The Overhead Power System consists of metal support poles with cross arms from which powered contact wires supported by messenger wires (catenary) are suspended above the light rail tracks to power the light rail vehicles (LRVs). The support poles are generally located between the two light rail tracks and support the wires for both alignments, although in some locations they may be positioned outside the light rail alignment. The poles may be painted or self-weathering steel.

Traction Power Substations, Signal Bungalows, and Signaling Systems

The Project will include a total of seventeen (17) TPSS's.³ TPSS sites will occupy about 4,000-square-feet and will accommodate a single-story prefabricated building with dimensions of roughly 40-by-20-feet. The sites will be completely enclosed with perimeter fencing. Access to the TPSS building by Metro Transit maintenance personnel must also be accommodated at the site. It is anticipated that most TPSS sites will be located within existing transportation ROW.

The Project will include a total of five (5) to six (6) signal bungalows located near special trackwork (such as crossovers). Additionally, there will be 11 to 12 combined station signal/communication bungalows located near each of the Project's stations. Signal bungalows are small prefabricated sheds, typically 10-by-30-feet in size, that house equipment to operate and monitor the signals that regulate train movement on the alignment. All bungalows will be installed at grade with access for maintenance.

Stations and Park-and-Ride Lots

Beginning at the existing Target Field Station in Minneapolis, there will be 12 stations along the Project alignment (11 new and one [1] existing): three (3) in Minneapolis, two (2) in Golden Valley, one (1) in Robbinsdale, one (1) in Crystal, and five (5) in Brooklyn Park (Table 1). All 11 of the new stations will be center-platform stations, three of which will include vertical circulation for passengers to access LRT station platforms (these three are Plymouth Avenue Station, Golden Valley Road Station, and a skyway/elevator from the existing parking structure at the 63rd Avenue Station). Park-and-ride facilities will be located at five (5) stations (Oak Grove Parkway Station, 63rd Avenue Station, Bass Lake Road Station, Robbinsdale Station, and Golden Valley Road Station). The 63rd Avenue park-and-ride is an existing Metro Transit parking structure which will be used to serve the Project.

The station platforms will be approximately 270-by-22-feet in size and raised 14 inches above the guideway railhead. All stations will have Americans with Disabilities Act (ADA) accessible facilities and include ticketing, lighting, shelters, and signage. While the specific designs for the station shelters will not be determined until a later date, depending on the requirements for individual

³ At the time this was prepared, the exact location of some TPSSs was not finalized so 300-foot diameter areas were delimited to identify the area in which they could be located. These 300-foot diameter areas will be refined during the engineering phase of project development to identify a more precise siting for the TPSS within the area. This refinement process will seek to minimize impacts to all surrounding properties and resources, not just historic properties, and balance safety, reliability, cost, and operational efficiencies.

stations, a typical station platform will have four three-sided shelters. These shelters may be set under individual canopies, or under longer, continuous canopies spanning multiple shelters. A typical free-standing shelter would have a 12-to-16-foot tall canopy that is approximately 36-by-19-feet in size and located above the platform. Signage will range from 18-to-24-feet in height.

Table 1. LRT Stations and Park-and-Ride Facilities

Station	New or Existing	Park-and-Ride Spaces
Minneapolis		
Target Field Station	Existing	None
Van White Memorial Boulevard Station	New	None
Penn Avenue Station	New	None
Golden Valley		
Plymouth Avenue Station	New	None
Golden Valley Road Station	New	100 (new)
Robbinsdale		
Robbinsdale Station	New	550 (new)
Crystal		
Bass Lake Road Station	New	170 (new)
Brooklyn Park		
63 rd Avenue Station	New	565 (existing)
Brooklyn Boulevard Station	New	None
85 th Avenue Station	New	None
93 rd Avenue Station	New	None
Oak Grove Parkway Station	New	850

Operations and Maintenance Facility

The OMF site will be located at the north end of the Project in Brooklyn Park. This location was selected based on its proximity to the end of the line, and adequate space for the facility (about 10.4 acres, or approximately 450,000-square-feet). The OMF site would be occupied by a LRT storage and maintenance building that is about 140,000-square-feet, surface parking for employees and visitors, trackwork, and open space. The facility will include areas to store, service, and maintain up to 30 light rail vehicles (LRVs), vehicle washing and cleaning equipment, and office space to accommodate staff who would report for work at this facility. The facility would be equipped to perform daily cleaning and repair activities on the LRVs as they enter and leave revenue service. Scheduled service and maintenance inspections also would be performed in this facility.

Bridges

The Project includes the construction of seven (7) new LRT bridges: a 350-foot-long crossing of the Hennepin Energy Recovery Center (HERC) driveway, a 700-foot-long crossing of the ponds immediately north of Golden Valley Road, a 1,200-foot-long crossing of Grimes Pond in

Robbinsdale, a 375-foot-long bridge over TH 100, a 1,260-foot-long bridge (260-foot span with 500-foot approaches on either side) over the CP rail tracks, a 925-foot-long bridge over the 73rd Avenue/Bottineau Boulevard intersection, and a 250-foot-long bridge over TH 610.

In addition, five reconstructed roadway bridges are part of the LPA: a 375-foot-long TH 55 bridge over the BNSF Rwy. line, a 375-foot-long Plymouth Avenue bridge, a 120-foot-long Theodore Wirth Parkway bridge, a 215-foot-long Golden Valley Road bridge, and a 110-foot-long 36th Street bridge. The bridges carrying TH 55 over I-94 in Minneapolis and I-94/I-694 over the BNSF Rwy. line in Brooklyn Park will require modifications to accommodate LRT.

Freight Rail Modifications

Freight rail service will continue to operate in its existing location within the BNSF Rwy. for the approximately 8.4 miles of shared ROW with the following general areas of freight rail modifications in Golden Valley, Robbinsdale, Crystal, and Brooklyn Park. Beginning at TH 55 and extending to north of 73rd Avenue North, the alignment of the existing freight rail track owned by the BNSF Rwy. will be shifted and reconstructed approximately 15-feet west of its existing alignment in order to allow the light rail alignment to be constructed in the eastern half of BNSF Rwy. ROW. The two exceptions are that the BNSF Rwy. freight rail track will run on its existing alignment within the Grimes Pond and Golden Valley ponds to eliminate the need to build a freight rail bridge structure across existing wetland areas. The BNSF Rwy. freight rail track will also run on its existing alignment over TH-100.

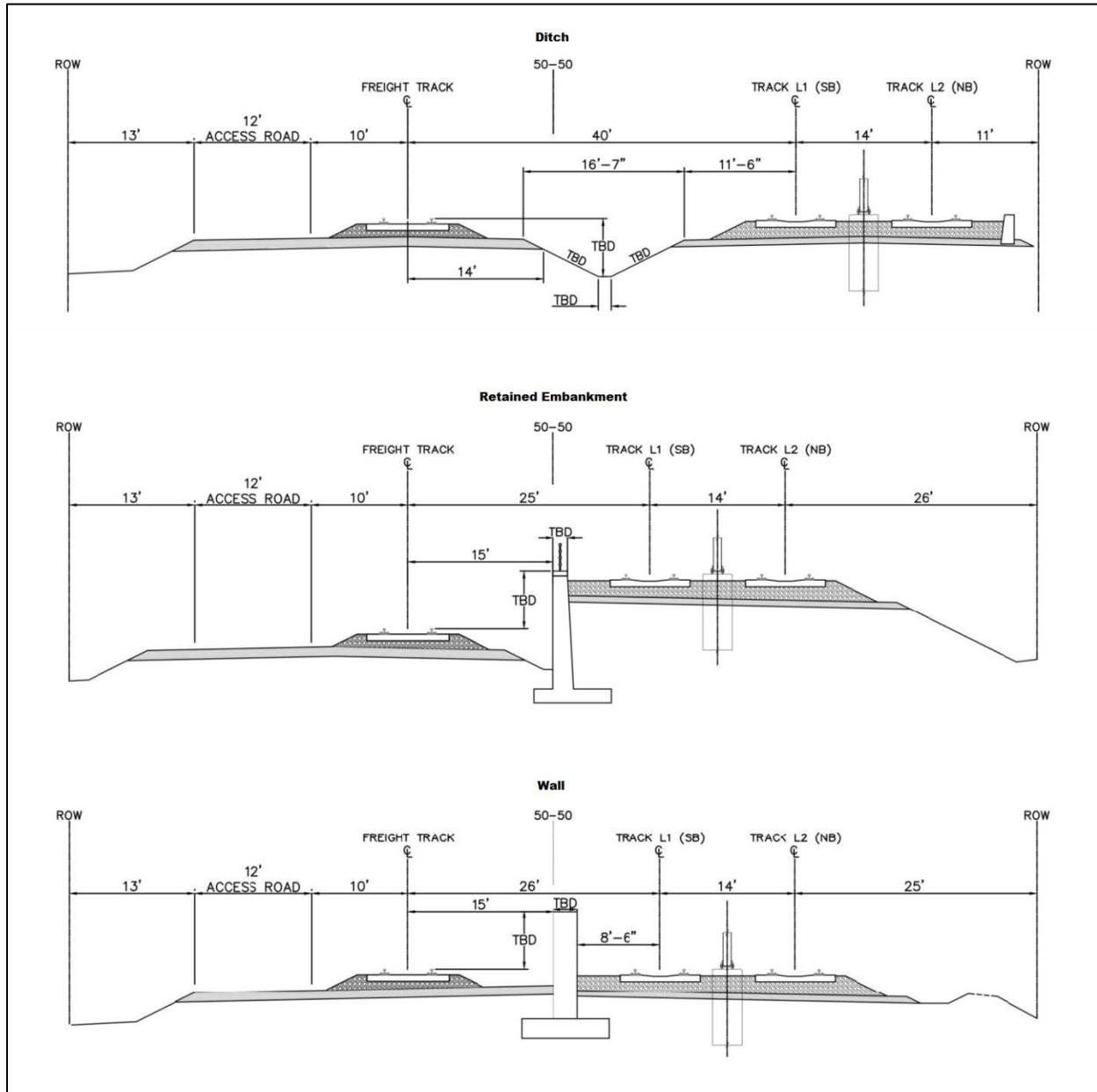
Corridor Protection Barrier

Along the portion of the Project alignment located within the BNSF Rwy. ROW, a corridor protection barrier will be constructed to physically separate the LRT guideway from the BNSF Rwy. freight rail tracks. The barrier will include a combination of horizontal separation, vertical separation, and physical means to provide safe operations. Three specific corridor protection treatments are proposed (Figure 2):

- A ditch will be used where ROW width permits. The width of the ditch will range from 12-to-17 feet, with a track spacing range of 35-to-40-feet on-center between the LRT and freight rail tracks;
- A retained fill option where LRT would be at a higher grade than freight rail, with the raised LRT roadbed supported by a retaining wall(s); and
- A wall with an approximate height of 6-feet and an approximate width of up to 2-feet thick, the design and materials would be determined as Project design advances.

Figure 2 includes a typical section of each corridor protection treatment.

Figure 2. Corridor Protection Treatments



Source: Metropolitan Council

Roadway Improvements

The Project will result in long-term physical modifications to existing roadways and intersections that will affect local circulation patterns. These changes to roadways will accommodate the introduction of the LRT alignment and related facilities and increase roadway capacity to respond to

anticipated demands on roadways (e.g., in response to demand at a new park-and-ride lot).⁴ Roadway improvements range from turn lane additions and reconfiguration of lane widths to new roadways, modifications to existing roadway alignments, and reconstruction of bridges.

Trunk Highway 55 Reconstruction

TH 55 will be reconstructed between the Target Field Station and the BNSF Rwy. corridor. This will include the full reconstruction of a six-lane roadway with the LRT guideway located in the center median, and includes the construction of new sidewalks on the north and south sides of the roadway. The existing bridge carrying TH 55 over I-94 will be modified to accommodate the LRT guideway in the middle of the bridge.

West Broadway Avenue

Hennepin County is planning to do a full reconstruction of West Broadway Avenue as part of a separate project between Candlewood Avenue and 93rd Avenue. This reconstruction may occur before or concurrent with the Project; however, it is being designed to allow for the introduction of LRT into its center median should the Project be implemented. The Project includes full reconstruction of West Broadway Avenue between 75th Avenue, where the LRT guideway would enter the median of West Broadway Avenue, and Candlewood Avenue, and then north of 94th Avenue, where the LRT guideway would exit the median of West Broadway Avenue to cross TH 610. The Hennepin County project includes construction of a 10-foot trail and 8-foot boulevard on the west and east sides of the roadway.

Bicycle and Pedestrian Improvements

The Project includes a variety of bicycle and pedestrian improvements to provide safe bicycle and pedestrian crossings of the proposed LRT alignment, to accommodate the proposed LRT and roadway improvements, and/or to provide bicycle and pedestrian connections to the proposed LRT stations. These improvements will affect several trails and sidewalks within the vicinity of the Project and include, but are not limited to, construction of ADA compliant curb ramps and detectable warnings, and relocations of regional and local trails.

Light Rail Vehicles

The LRVs will be similar to those in use on the existing METRO Green Line and Blue Line (Figure 3). The LRVs will be designed to operate independently or as a multiple-unit train of up to three vehicles. A pantograph located on the roof of the LRV will collect power from the overhead power

⁴ The Project includes intersection modifications, new traffic signals, changes to existing traffic signals, and other traffic management techniques at intersections and at-grade light rail crossings of roadways within the roadways and traffic study area, so that the Project will not cause an unacceptable level of congestion, or worsen traffic operations at intersection that already experience an unacceptable level congestion compared to the 2040 No Build Alternative. Congestion is defined in terms of level of service (LOS). The Project will: 1) generally provide intersection operations of Level of Service D or better; or, 2) when the 2040 No Build Alternative LOS would be E or F, provides intersection operations that will be the same as or better than the No Build Alternative.

system. Each car will be equipped with level boarding for ADA accessibility and will be able to accommodate bicycles. LRV speeds will vary depending on operational conditions and will be set prior to the start of revenue operations based on a safety certification review. In Downtown Minneapolis they will operate at speeds of approximately 20 miles per hour, but along some segments of the alignment they may operate at top speeds ranging from 55 to 60 miles per hour.

Figure 3. Typical LRV



Source: Metropolitan Council

Transit Operations

The Project entails a number of changes to transit operations in the Corridor including existing and planned bus systems of Metro Transit. The service plans will be revised prior to opening in 2021, and will be a result of a service planning process that complies with the Council's service planning policies, with federal requirements (e.g., Title VI), and a variety of external factors (e.g., transit demand, funding availability, public and agency comment).

LRT Operations

The Project will have the effect of increasing both the average weekday light rail vehicle miles traveled (VMT) and revenue hours in the region, relative to the present (average weekday, 2040). Since the Project will have an interline connection with the existing METRO Blue Line (originally known as Hiawatha LRT), the Project's operating hours and frequency of service will be similar to the existing METRO Blue Line. As such the Project is expected to operate on 10-minute peak-period headways from approximately 6:30 a.m. to approximately 9:00 p.m., with less frequent service during early morning and late evening hours, and no service between approximately 2:00 a.m. and 4:30 a.m.⁵

⁵ Headways are the average time between transit vehicles operating in the same direction by a common point over a given period of time (e.g., four inbound light rail trains passing by a station within one hour would result in a 15-minute headway).

Section 3: Section 106 Legal and Regulatory Context

Prior to implementing an undertaking, Section 106 of the NHPA requires Federal agencies to consider the effects of the undertaking on historic properties that are included in, or are eligible for inclusion in, the NRHP. Undertakings include projects a federal agency carries out, approves or licenses, or funds. Federal agencies must also afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the project prior to the agency making a decision.

As described in 36 CFR § 800 et. seq., which implements Section 106, the Section 106 process includes the following steps:

1. Initiation of the Section 106 process:
 - Establish the undertaking;
 - Notify the State Historic Preservation Officer (SHPO) and any Tribal Historic Preservation Officers (THPOs);
 - Plan to involve the public; and
 - Identify other consulting parties.
2. Identification of historic properties:
 - Determine the APE; and
 - Complete a survey of the APE to identify historic properties that are listed in or eligible for inclusion in the NRHP.
3. Assessment of adverse effects:
 - Apply criteria of adverse effect.
4. Resolution of adverse effects:
 - Continue consultation to consider measures to avoid, minimize, or mitigate adverse effects;
 - Reach agreement with the SHPO, any THPOs, and the ACHP if it chooses to participate in the consultation; and
 - Prepare a Section 106 agreement to document measures that will be implemented by the Federal agency to avoid, minimize, and/or mitigate adverse effects.

Section 4: Identification of Historic Properties

Area of Potential Effect

An APE is “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR § 800.16[d]). An APE must account for both direct and indirect effects, including permanent and temporary effects.

MnDOT CRU, under delegation from FTA and in consultation with MnSHPO, determined an APE for the Project in 2011. Two APEs were established, one for architecture/history properties and one for archaeological resources. MnSHPO has concurred with both APEs.⁶

Architecture/History APE

The APE for architecture/history properties (Figures 4 and 5) includes all areas within 500-feet on either side of the proposed alignment and within a 0.25 mile radius from the center point of proposed stations and the OMF. In addition, the architecture/history APE includes the following areas that are based on the type of Project improvement:

- New structures (new or replacement bridges, pedestrian bridges, etc.) – 0.25 mile radius from the structure (assumes the potential for pile driving);
- Existing structures – modification (widening/reconstruction of existing structures) – 0.25 mile radius from the structure (assumes the potential for pile driving); and
- Existing structures – pier modification only (moving piers to allow the LRT to go under) – 500-foot radius from the structure (assumes using drilling and no pile driving).

Archaeological APE

The APE for archaeological resources (Figures 6 and 7) includes all areas of proposed construction activities or other potential ground disturbing activities associated with construction.⁷ Based on the

⁶ Letter from MnSHPO to MnDOT CRU dated October 26, 2011. The APE that MnSHPO concurred with included the entirety of the LPA, as well as various alternative alignments that were under consideration at the time the APE was established. These alternative alignments were considered during the development of the DEIS, but were not selected as part of the LPA and have been dropped from further consideration. Therefore, they are not depicted in Figures 4-7.

⁷ Figures 6-7 depict the location of the LPA and the corresponding archaeological APE. As the Project design has advanced since the archaeological APE was established, there have been several slight revisions to the Project design, but not to the Project scope. As a result, as is depicted in Figure 7, there are several small portions of the LPA that are now located outside the existing archaeological APE. However, the Phase IA archaeological investigation conducted for the Project (see later in this section) studied an area extending 0.25 miles beyond the archaeological APE, so the portions of the current LPA that are located outside the archaeological APE have been

current understanding of the proposed project, the Archaeological APE generally includes the existing railroad ROW for portions of the project within an existing railroad corridor, and the potential area of disturbance for other areas. The Archaeological APE for the stations includes all areas within 500-feet from the center point of the currently proposed station platforms to account for potential direct impacts from construction or development activities. Similarly, the Archaeological APE for the proposed park-and-rides and the OMF includes all areas within 500-feet from the potential area of disturbance.

studied. No historic properties were identified and these areas were found to have low potential for archaeological resources to exist. The portion of the LPA outside the APE, from and including the 93rd Avenue station and its park-and-ride facility to the OMF site, also were previously surveyed at a Phase I level for another project and no historic properties were identified (see Woodward-Clyde, 1994). MnDOT CRU also examined the portions of the LPA outside the present APE again on January 12, 2016 through the use of its Minnesota Model (MnModel) and confirmed these areas have low archaeological site potential. Based on the previous archaeological assessments completed for the Project, the 1994 survey by Woodward-Clyde, and MnModel data, FTA has determined there is low potential for archaeological resources to exist, but will incorporate measures covering unanticipated discoveries during construction in its Section 106 MOA for the Project.

Figure 4. Architecture/History APE: South of Bass Lake Road

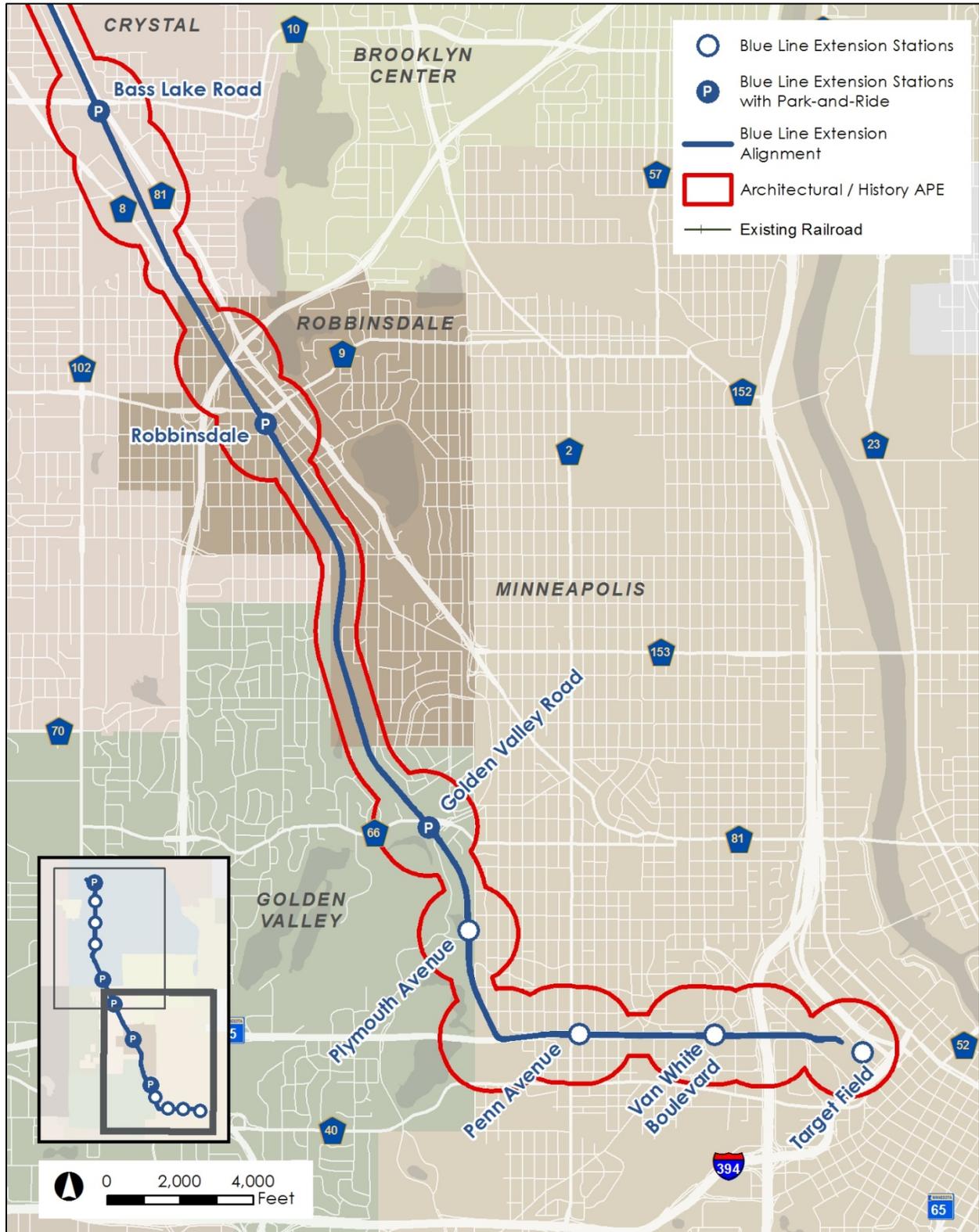


Figure 5. Architecture/History APE: North of Bass Lake Road

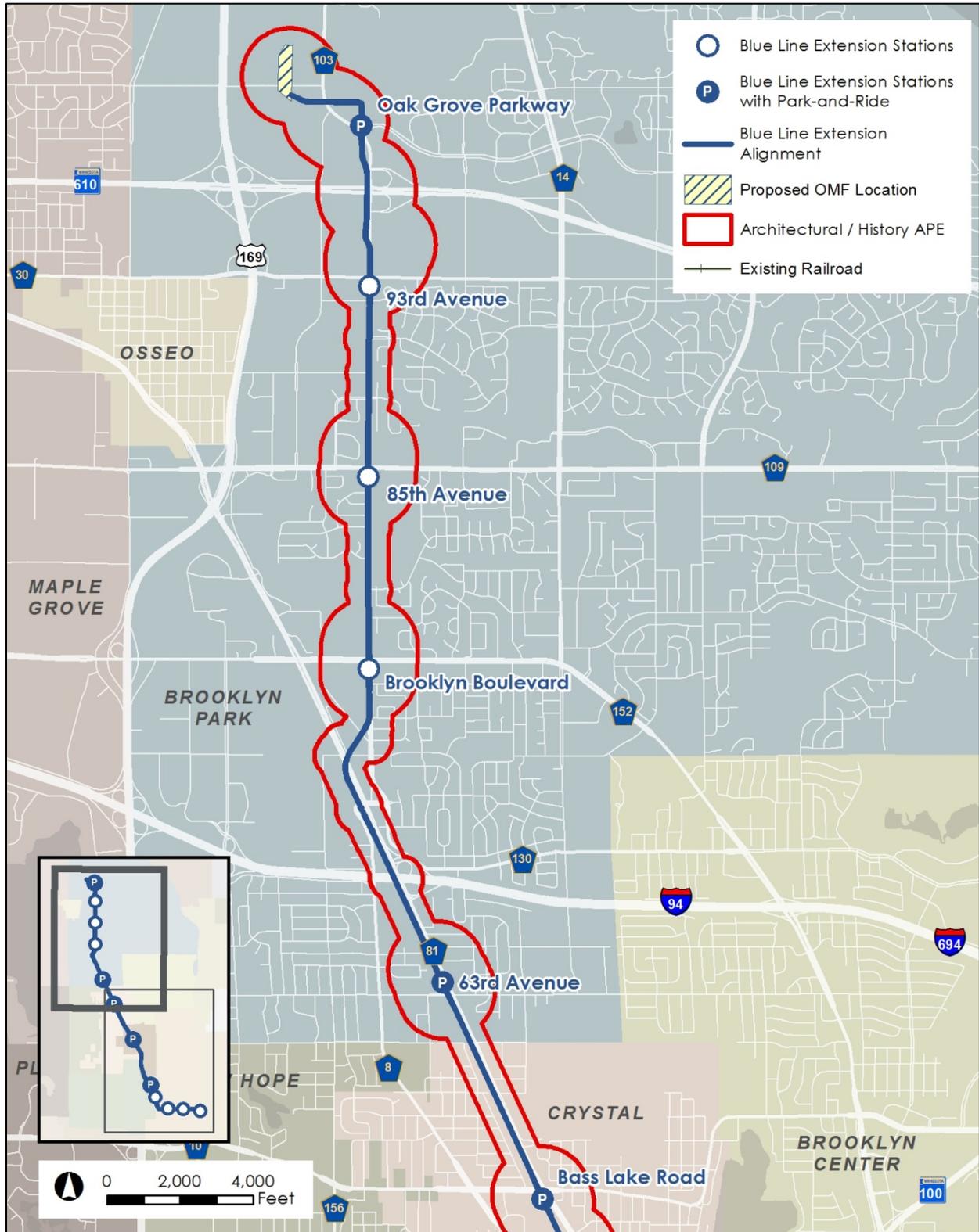


Figure 6. Archaeological APE: South of Bass Lake Road

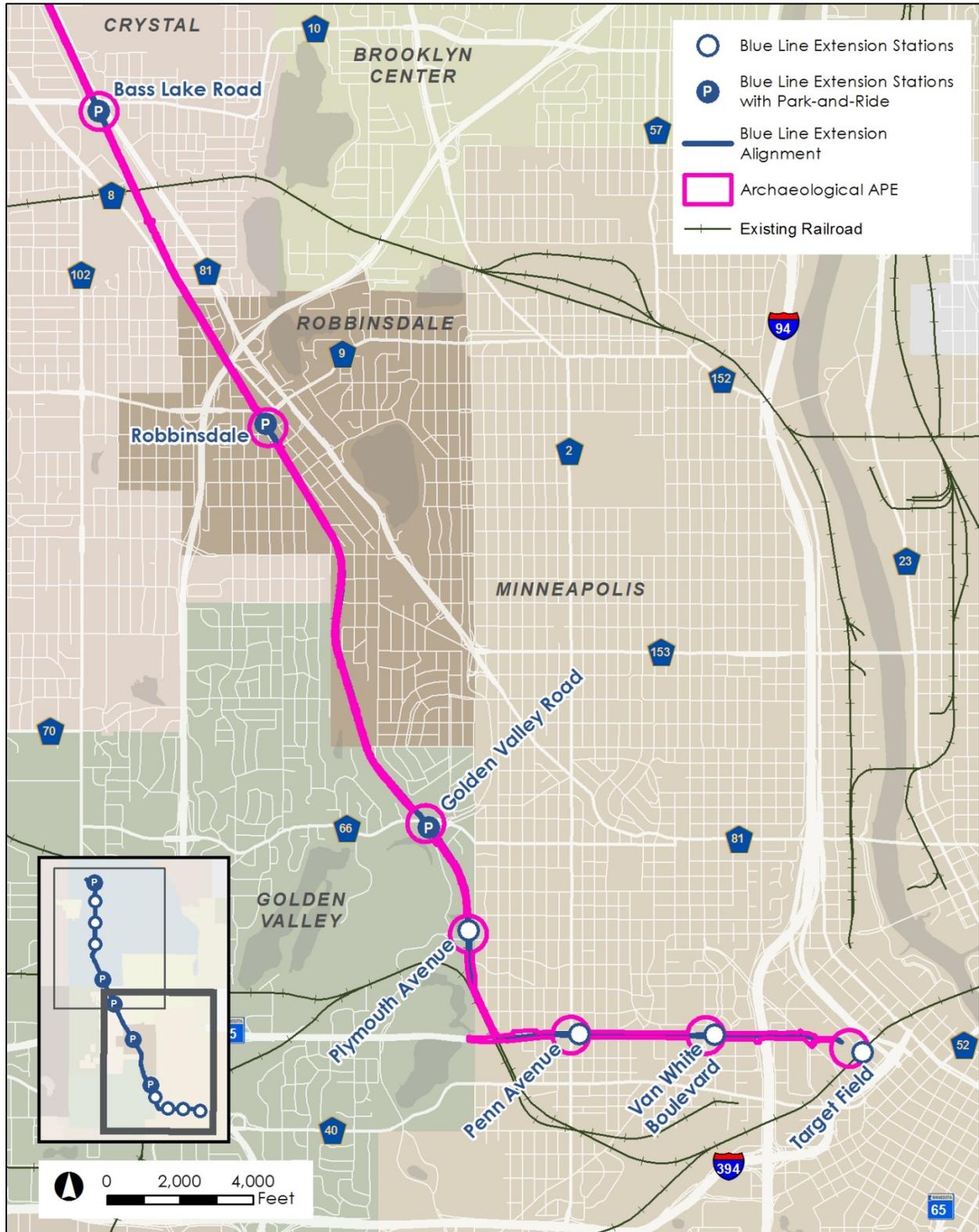


Figure 7. Archaeological APE: North of Bass Lake Road



Identification and Evaluation of Historic Properties

Section 106 requires Federal agencies to consider the effects of their undertakings on historic properties that are listed in or are eligible for inclusion in the NRHP, which is the nation's official list of historic places worthy of preservation. Therefore, historic property surveys were undertaken to identify and evaluate historic properties listed in or eligible for inclusion in the NRHP located within the Project's architecture/history and archaeological APEs.

National Register Criteria

In order to qualify for inclusion in the NRHP a property must possess significance under at least one of four criteria:

- A. Association with events that have made significant contributions to broad patterns of history.
- B. Association with the lives of persons significant in our past.
- C. Embodiment of distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- D. Has yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4; NPS 1997).

In general, a historic property must be at least 50 years of age or older to be considered for the NRHP, however, properties less than 50 years of age may be considered for listing if they possess exceptional significance. In addition to possessing significance, to be eligible for the NRHP a property must also retain sufficient historic integrity: "Integrity is the ability of a property to convey its significance" (NPS 1997:44). There are seven aspects or qualities that must be considered to determine whether a property retains integrity:

- Location: the place where the historic property was constructed or the place where the historic event occurred;
- Design: the combination of elements that create the form, plan, space, structure, and style of a property
- Setting: the physical environment of a historic property;
- Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;
- Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
- Feeling: a property's expression of the aesthetic or historic sense of a particular period of time; and
- Association: the direct link between an important historic event or person and a historic property.

Historic Properties Surveys

To identify historic properties within the Project's architecture/history and archaeological APEs, two architecture/history surveys, one archaeological survey, and one cultural landscape study have

been completed since 2011 (Table 2). This effort included documenting previously identified or evaluated properties, as well as conducting field surveys to document any previously unidentified properties more than 50 years of age within the Project's APEs. To encompass the environmental review period and construction process, all properties that were constructed in 1965 or earlier within the Project's APEs were surveyed and evaluated. The cultural landscape study was completed for one NRHP eligible property to inform the assessment of effects analysis for this historic property.

Table 2. Reports Documenting Results of Surveys to Identify Historic Properties in the Project's APEs

Title	Date
Architecture/History Survey Reports	
<i>Phase I & II Architectural History Survey for the Bottineau Transitway Project, Crystal, Brooklyn Park, Golden Valley, Maple grove, Minneapolis, New Hope, and Robbinsdale, Hennepin County, Minnesota, Volume 1</i>	Nov 2012
<i>Phase I & II Architectural History Survey for the Bottineau Transitway Project, Crystal, Brooklyn Park, Golden Valley, Maple grove, Minneapolis, New Hope, and Robbinsdale, Hennepin County, Minnesota, Volume 2</i>	Nov 2012
<i>Bottineau Transitway Phase I & II Architectural History Survey, Hennepin County, Minnesota: Supplemental Report 1</i>	June 2013
Archaeological Survey Reports	
<i>Phase IA Archaeological Assessment for the Bottineau Transitway Project, Hennepin County, Minnesota.</i>	Nov 2012
Cultural Landscape Study Reports	
<i>Theodore Wirth Regional Park Cultural Landscape Study for the Blue Line Extension LRT Project, Golden Valley and Minneapolis, Hennepin County, Minnesota.</i>	Sept 2015

Results of Investigations

Based on the results of the investigations identified above, MnDOT CRU, under delegation from FTA, made eligibility determinations and provided them to the MnSHPO for concurrence. MnSHPO has concurred with all of the eligibility determinations.⁸ In total, 17 NRHP listed and eligible properties have been identified in the Project's architecture/history and archaeological APEs (Table 3; Figures 8 and 9). All properties identified are architecture/history properties resources. No archaeological resources listed, or eligible for listing, on the NRHP were identified.

Table 3. Number of NRHP Listed and Eligible Properties in the Project's APEs

Resource Type	NRHP Status	
	Listed	Eligible
Historic Districts	1	6
Individual Resources	3	7

⁸ In a letter dated January 29, 2013, MnSHPO concurred with the eligibility determinations of all historic properties other than Sacred Heart Catholic Church; MnDOT CRU had recommended the Church as not eligible for the NRHP, but MnSHPO disagreed. In a letter dated July 8, 2013, MnDOT CRU revised its determination for the Church from ineligible to eligible for inclusion in the NRHP. MnSHPO concurred with this determination in a letter dated August 7, 2013.

Figure 8. Historic Properties: South of Bass Lake Road

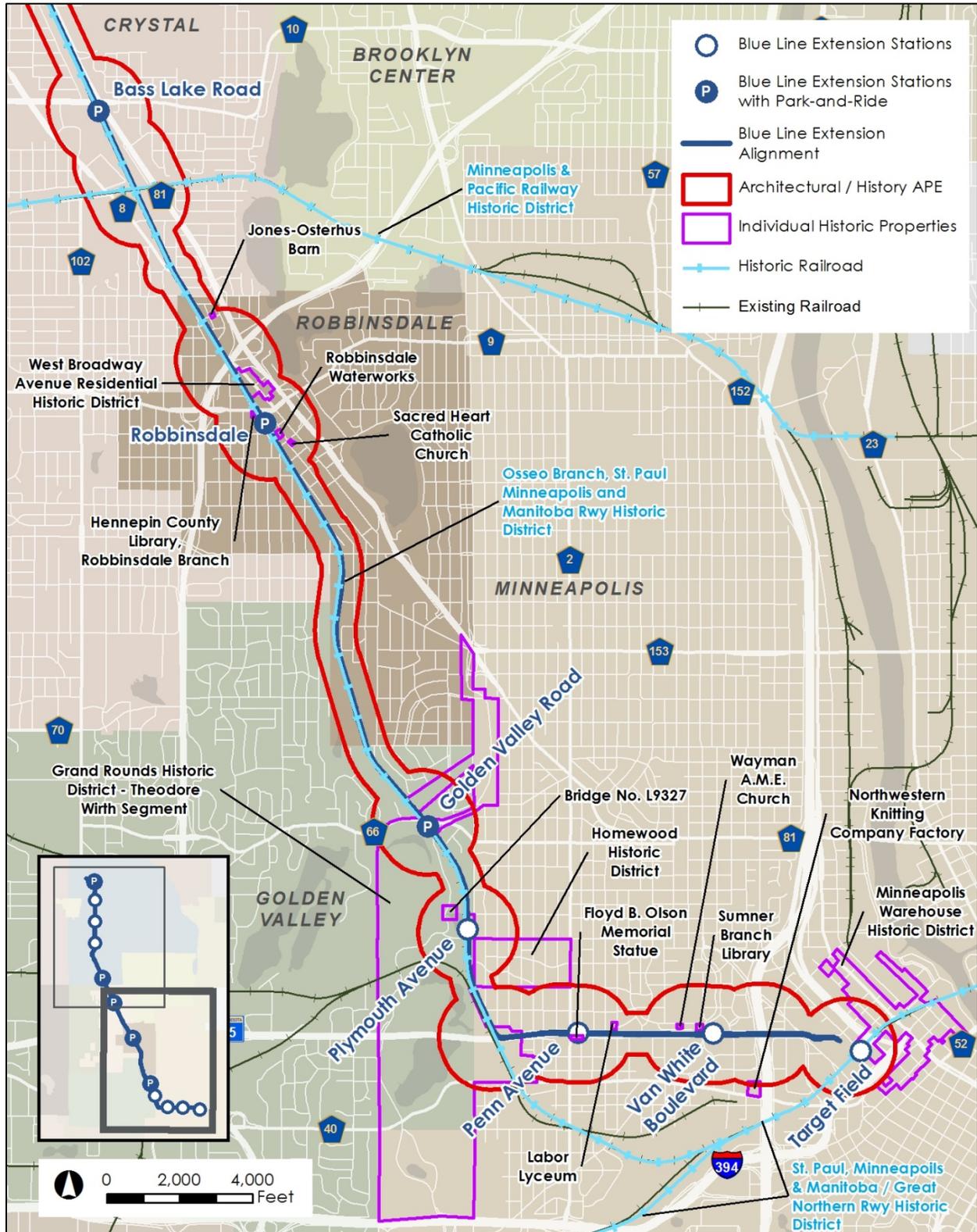
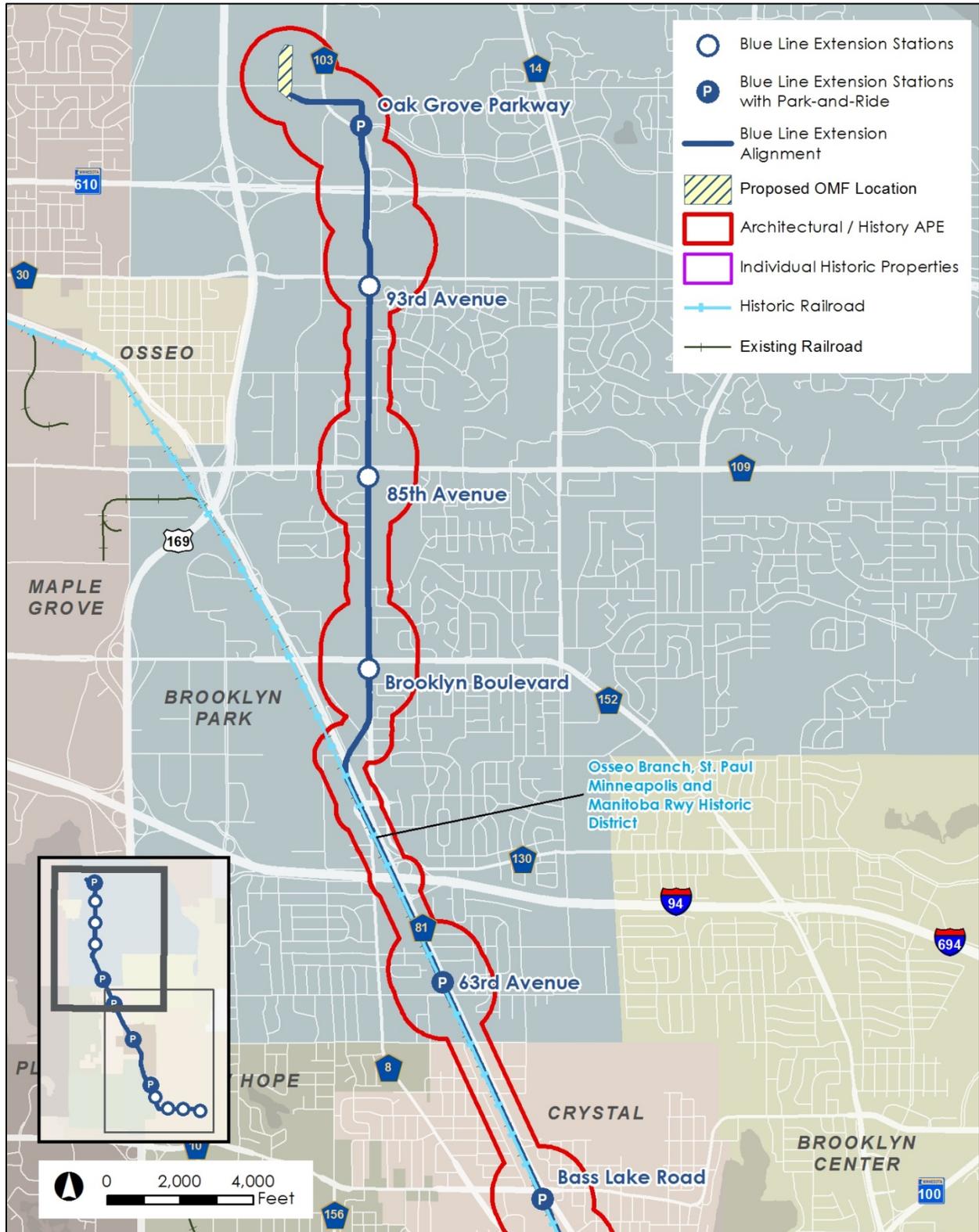


Figure 9. Historic Properties: North of Bass Lake Road



The remainder of this section describes the NRHP listed and eligible properties in the Project's APEs. Properties are described generally in order in which they are located from southeast to northwest along the Project corridor. The approximate distance from each historic property to the Project's limit of disturbance (LOD) is also included; this distance measurement accounts for both permanent and temporary easements.

Minneapolis Warehouse Historic District (HE-MPC-0441)

Address: Bounded by 1st Avenue North, 1st Street North, 10th Avenue, and 6th Street, Downtown Minneapolis

Distance to LOD: 430 feet

NRHP Status: Listed

NRHP Criteria: A, C

Areas of Significance: Architecture, Commerce

Period of Significance: 1865-1930

- The 30-block warehouse and wholesaling district that represents early commercial growth in downtown Minneapolis and the city's importance as the major distribution center for the upper Midwest
- Architecturally distinct for its intact concentration of commercial buildings designed by the city's leading architects
- Includes nineteenth and early twentieth century commercial buildings, and include examples of Italianate, Queen Anne, Richardsonian Romanesque, Classical Revival, and Commercial style architecture

St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District (XX-RRD-010)

Address: Minneapolis

Distance to LOD: 590 feet

NRHP Status: Eligible

NRHP Criterion: A

Area of Significance: Transportation

Period of Significance: 1880-1956

- Connected the Red River Valley wheat farms with the Minneapolis milling district, which was a significant factor in the development of the Minneapolis flour milling industry
- Helped solidify Minneapolis and St. Paul as the commercial, financial, and manufacturing center of the area from eastern Wisconsin to central Montana
- Was an important component in the GN's transcontinental route to Puget Sound

Northwestern Knitting Company Factory (HE-MPC-8125)

Address: 718 Glenwood Avenue, Minneapolis

Distance to LOD: 1,150 feet

NRHP Status: Listed

NRHP Criterion: A

Areas of Significance: Commerce, Engineering, Industry, Invention

Period of Significance: 1904-1915

- Company was the nation’s leading producer and distributor of underwear (“Munsingwear”) from its founding in 1887 by George Munsing, to 1981, when company went out of business
- Between 1904 and 1915, complex was expanded to include five buildings designed by Minneapolis architects Bertrand and Chamberlain

Sumner Branch Library (HE-MPC-8081)

Address: 611 Emerson Avenue North, Minneapolis
Distance to LOD: 0 feet
NRHP Status: Listed
NRHP Criteria: A, B
Areas of Significance: Education, Social History
Period of Significance: 1915-1949

- One of four Carnegie-funded public libraries in Minneapolis
- Extensive outreach program that affected educational and cultural development of Minneapolis
- Property best associated with Gratia Alta Countryman, longtime head of the Minneapolis Public Library and leader in the movement to develop a public library system nationwide

Wayman African Methodist Episcopal (A.M.E.) Church (HE-MPC-8290)

Address: 1221 7th Avenue North, Minneapolis
Distance to LOD: 40 feet
NRHP Status: Eligible
NRHP Criterion: C
Area of Significance: Architecture
Period of Significance: 1966

- Designed by architect Harry E. Gerrish
- Outstanding and distinctive example of Mid-Century Modern ecclesiastical architecture in Minneapolis
- Important and distinctive example of nationwide changes in ecclesiastical architectural design that rejected historicism and embraced new abstract, asymmetrical, and futuristic designs

Labor Lyceum (HE-MPC-7553)

Address: 1800 TH 55, Minneapolis
Distance to LOD: 40 feet
NRHP Status: Eligible
NRHP Criterion: A
Areas of Significance: Social History, Politics/Government
Period of Significance: 1915-1948

- Center of immigrant Jewish labor movements in the early twentieth century. In Minneapolis, the building was home to the Workmen’s Circle, which was part of the anti-Zionist Communists and Socialists labor movement within Minneapolis’ Jewish community.
- Illustrates perpetuation of Jewish culture and traditions

Floyd B. Olson Memorial Statue (HE-MPC-9013)

Address: TH 55 at Penn Avenue North, Minneapolis

Distance to LOD: 0 feet

NRHP Status: Eligible

NRHP Criterion: C

Area of Significance: Art

Period of Significance: 1940

- Significant example of an expression of the work of master sculptor Carlo Brioschi during the last state of his career (1931-1940)
- Represents Brioschi's turn in focus from primarily architectural ornamentation to outdoor freestanding sculpture
- Erected in 1940 to commemorate Minnesota's popular 22nd Governor, Floyd B. Olson (1891-1936)

Osseo Branch Line of the St. Paul, Minneapolis & Manitoba Railroad / Great Northern Railway Historic District (HE-RRD-002; segments: HE-MPC-16389; HE-RBC-0304; HE-CRC-0238; HE-BPC-0084)

Address: Minneapolis, Golden Valley, Crystal, Robbinsdale, Brooklyn Park, Osseo

Distance to LOD: 0 feet (Project alignment is located within a portion of this property)

NRHP Status: Eligible

NRHP Criterion: A

Area of Significance: Transportation

Period of Significance: 1881-1931

- The 13-mile segment of this line from Minneapolis to Osseo supported the potato farming development of Osseo and surrounding areas. It established a connection that did not previously exist that resulted in a significant expansion of potato-growing region in northern Hennepin County for the construction of line to the decline of the potato industry.

Grand Rounds Historic District, Theodore Wirth Segment (XX-PRK-0001)

Address: Minneapolis, Golden Valley, Robbinsdale

Distance to LOD: 0 feet (Project alignment is located within a portion of this property)

NRHP Status: Eligible

NRHP Criteria: A, C

Areas of Significance: Community Planning and Development, Entertainment / Recreation, Landscape Architecture

Period of Significance: 1884-1942

- Represents conscious effort to link all areas of the city into a comprehensive and unified system; christened the "Grand Rounds" in the early 1890s
- Nationally significant example of urban park development in the nineteenth and twentieth centuries
- One of the most unique and iconic features of Minneapolis, which draws national attention for its role as a recreational resource that enhances the vitality of a major American city
- Most comprehensive design by, and crowning achievement of, nationally prominent landscape architect Horace William Shaler Cleveland

- Most important work by nationally prominent landscape architect and park professional Theodore Wirth

Homewood Residential Historic District (HE-MPC-12101)

Address: Bounded by Penn Avenue, Oak Park Avenue, Xerxes Avenue, and Plymouth Avenue, Minneapolis

Distance to LOD: 0 feet

NRHP Status: Eligible

NRHP Criterion: A

Areas of Significance: Community Planning and Development, Social History

Period of Significance: 1909-1962

- Early, planned, distinctive subdivision in North Minneapolis
- Focal point of the Jewish community in western North Minneapolis from 1911 until late 1960s

Bridge No. L9327 (HE-GVC-0050)

Address: Theodore Wirth Parkway over Bassett's Creek (in Theodore Wirth Park), Golden Valley

Distance to LOD: 480 feet

NRHP Status: Eligible (individually and as a contributing element to the Grand Round Historic District)

NRHP Criteria: C (individually), A and C (Grand Round Historic District)

Areas of Significance: Engineering (individually); Community Planning and Development, Entertainment/Recreation, Landscape Architecture (Grand Rounds Historic District)

Periods of Significance: 1940 (individually), 1940-1942 (Grand Rounds Historic District)

- The bridge is individually significant for its notable aesthetics
 - Single-span, reinforced-concrete arch bridge faced in St. Cloud granite with pentagonal voussoirs (stones around the arch), a stringcourse, and an open balustrade reflective of the patio railing on the Chateau
 - Excellent example of an ornamental park bridge
 - Designed in a notable restrained Classical Revival Style
- The bridge is also a contributing element of the Grand Rounds Historic District (the significance of this historic district is described above)

Sacred Heart Catholic Church (HE-RBC-1462)

Address: 4087 West Broadway Avenue, Robbinsdale

Distance to LOD: 130 feet

NRHP Status: Eligible

NRHP Criterion: C

Area of Significance: Architecture

Period of Significance: 1950

- Embodies efforts to apply Modernist design principles while working within the design constraints of the pre-Vatican II Catholic Church

- Signals transition of religious architecture from the Gothic Revival style, which was the prevalent architectural style for religious buildings prior to World War II, to Modernism after the war

Robbinsdale Waterworks (HE-RBC-286)

Address: 4127 Hubbard Avenue North, Robbinsdale

Distance to LOD: 0 feet

NRHP Status: Eligible

NRHP Criterion: A

Areas of Significance: Community Planning and Development, Politics / Government

Period of Significance: 1937-1963

- Association with Great Depression and subsequent development of federal relief projects, under which a portion of this property was constructed
- Original portion of the plant, including original pump house (Well No. 1) and water tower, are examples of WPA public utility project in Minnesota
- Embodies community's efforts to address water quality issues and fire protection needs of the community after a major fire in 1925

Hennepin County Library, Robbinsdale Branch (HE-RBC-024)

Address: 4915 42nd Avenue North, Robbinsdale

Distance to LOD: 0 feet

NRHP Status: Listed

NRHP Criterion: A

Area of Significance: Education

Period of Significance: 1925-1978

- Association with the Robbinsdale Library Club, which raised funds for the building and the library collection without aid of government funding
- Symbol of community's dedication to learning and its efforts to implement that dedication
- Focal point of community identity

West Broadway Avenue Residential Historic District (HE-RBC-158)

Address: West Broadway Avenue, between North 42nd Avenue and TH 100, Lakeland Avenue North to the BNSF Rwy. ROW, Robbinsdale

Distance to LOD: 0 feet

NRHP Status: Eligible

NRHP Criterion: C

Area of Significance: Architecture

Period of Significance: 1920-1940

- Best remaining example of pre-World War II suburban housing in the Robbinsdale area
- Architecturally diverse collection of Colonial Revival, Tudor Revival, Craftsman, and Prairie style houses
- Was home to many locally prominent residents

Jones-Osterhus Barn (HE-RBC-264)

Address: 4510 Scott Avenue North, Robbinsdale

Distance to LOD: 190 feet

NRHP Status: Eligible

NRHP Criterion: C

Areas of Significance: Agriculture, Architecture

Period of Significance: 1860-1888

- Rare example of a barn from first period of agricultural development in Minnesota
- Transition from grain production to diversified farming
- Shows settler's adaptability in using available building materials

Minneapolis & Pacific Railway / Minneapolis, St. Paul & Sault Ste. Marie Railway Historic District (HE-CRC-199)

Address: Crystal

Distance to LOD: 0 feet (the reconstructed BNSF Rwy. will continue to cross this property at grade, while the LRT alignment will cross directly over it on a new bridge)

NRHP Status: Eligible

NRHP Criterion: A

Area of significance: Transportation

Period of Significance: 1884-1930

- Minneapolis & Pacific (M&P) Rwy. was incorporated by Minneapolis mill owners in 1884 to construct a mainline from Minneapolis to the Red River Valley in order to secure a connection to wheat growers in western Minnesota and eastern North Dakota
- Was the first successful effort by Minneapolis mill owners to reach large, profitable markets in the East and Europe directly
- In 1888, M&P consolidated with three other lines to become the Minneapolis, St. Paul & Sault Ste. Marie Railway Company (Soo Line Rwy.), which is now part of the Canadian Pacific (CP) Rwy.

Section 5: Section 106 Consultation

FTA, with assistance from MnDOT CRU, initiated Section 106 consultation for the Project in February 2011 and, in accordance with 36 CFR § 800.3, has regularly consulted since that time with MnSHPO, Indian tribes, local governments, and other parties with a demonstrated interest to consider effects of the project on historic properties included on, or eligible for listing on, the NRHP. As described below, FTA consulted directly with Indian tribes, while MnDOT CRU, under delegation from FTA, completed most of the consultation with MnSHPO and other consulting parties.

Agency Coordination and Public Involvement

FTA initiated consultation with MnSHPO in February 2011. Section 106 consulting parties include MnSHPO; USACE; Hennepin County; the Cities of Brooklyn Park, Crystal, Golden Valley, Minneapolis, and Robbinsdale; and the Minneapolis Park and Recreation Board.

In accordance with 36 CFR § 800.8, Section 106 consultation efforts were coordinated with the NEPA process and related outreach activities and events. In particular, opportunities for the public to review information and provide comments related to steps in the Section 106 process were incorporated, as appropriate, into public meetings related to the NEPA and design and engineering processes. The opportunities included open houses held on station design options near historic properties. At these meetings, information was shared summarizing the steps in the Section 106 process, historic properties identified, and effects to historic properties. A list of meetings related to agency coordination and public involvement efforts is included in Table 4.

Table 4. Meetings Related to Section 106

Date	Meeting Type	Purpose
June 6, 2015	Section 106 Consulting Parties Meeting	Section 106 process overview, BLRT project overview, Section 106 findings through DEIS
July 10, 2015	Section 106 Consulting Parties Meeting	Discuss potential effects on historic properties, present Theodore Wirth Cultural Landscape Study
July 16, 2015	Section 106 Consulting Parties Meeting	Discuss potential effects on historic properties, present Theodore Wirth Cultural Landscape Study
Oct 19, 2015	Public Open House in Crystal	Environmental review process. Included boards with information on historic properties in the APE in Crystal and potential Project effects on these properties.
Oct 20, 2015	Public Open House in Brooklyn Park	Environmental review process. Included boards with information on historic properties in the APE in Brooklyn Park and potential Project effects on these properties.
Oct 21, 2015	Public Open House in Robbinsdale	Environmental review process. Included boards with information on historic properties in the APE in Robbinsdale and potential Project effects on these properties.

Date	Meeting Type	Purpose
Oct 28, 2015	Public Open House in Golden Valley	Environmental review process. Included boards with information on historic properties in the APE in Golden Valley and potential Project effects on these properties.
Oct 29, 2015	Public Open House in Minneapolis	Environmental review process. Included boards with information on historic properties in the APE in Minneapolis and potential Project effects on these properties.

To comply with Section 106 requirements, MnDOT CRU submitted the architecture/history and archaeological APEs, the results of the surveys/investigations completed for the Project, including NRHP eligibility determinations, and preliminary assessments of effects to the MnSHPO for concurrence, copying other Section 106 consulting parties for their review and comment. Additional consultation with MnSHPO and Section 106 consulting parties has continued to consider effects on historic properties.

Tribal Consultation

In January 2012, the FTA sent letters to potentially affected Indian tribes, requesting that they identify any concerns about potential Project effects and inviting them to participate in public scoping meetings and/or schedule a separate meeting to discuss any specific tribal issues and concerns. Letters were sent to the Lower Sioux Indian Community, Upper Sioux Indian Community, Bois Forte Band (Nett Lake) of Minnesota Chippewa, Fond du Lac Band of Minnesota Chippewa, Grand Portage Band of Minnesota Chippewa, Leech Lake Band of Ojibwe, Mille Lacs Band of Ojibwe, Red Lake Tribal Council, White Earth Band of Minnesota Chippewa, Prairie Island Indian Community, Shakopee Mdewakanton Sioux Community, Bad River Band of Lake Superior Chippewa, Lac Vieux Desert Band of Lake Superior Chippewa, Red Cliff Band of Lake Superior Chippewa, Lac Courte Oreilles Band of Lake Superior Chippewa, Lac du Flambeau Band of Lake Superior Chippewa, St. Croix Chippewa Indians of Wisconsin, Sokaogon (Mole Lake) Chippewa, Turtle Mountain Band of Chippewa, Sisseton-Wahpeton Oyate, Santee Sioux Nation, Flandreau Santee, Fort Peck Tribes, Spirit Lake Tribe, Three Affiliated Tribes, Keweenaw Bay Indian Community, Northern Cheyenne Tribe and the Standing Rock Sioux. No responses were received. The tribes also received copies of the DEIS and were invited to comment on the documents; no comments were received.

Section 6: Assessment of Effects

Assessing Effects on Historic Properties

The criteria that must be used to assess effects of Federal undertakings on historic properties that are listed in or are eligible for listing in the NRHP is set forth 36 CFR § 800.5(a)(1):

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

An adverse effect can occur if any aspect of a historic property's integrity is diminished. Examples of adverse effects are identified in 36 CFR § 800.5(a)(2) and include, but are not limited to:

Physical destruction of or damage to all or part of the property;

Alteration of a property that is not consistent with the Secretary of the Interior's (SOI's) Standards for the Treatment of Historic Properties (36 CFR § 68) and applicable guidelines;

Removal of the property from its historic location;

Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;

Neglect of a property that causes its deterioration; and

Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

It is important to note that just because an undertaking may have an effect on a historic property it does not necessarily constitute an adverse effect. For example, project elements may be visible from a historic property without the effect rising to the level of an adverse effect. In this example, factors to consider when assessing whether the visual effect is adverse would include proximity of project components to the historic property, the nature of the element being introduced to the setting, the significance of the views to and from the historic property, and the overall importance of integrity of setting to the historic property's ability to convey its significance and maintain its eligibility for the NRHP. Direct effects, however, are often more likely to result in an adverse effect due to the actual physical changes they often cause to a historic property, although one notable exception is

rehabilitation projects completed in accordance with the SOI's Standards for the Treatment of Historic Properties (36 CFR § 68).

Effects Assessment and Effects Findings

In accordance with 36 CFR § 800.5(a), the criteria of adverse effect was applied to the 17 NRHP listed and eligible historic properties located within the Project's architecture/history and archaeological APEs properties. Reference materials utilized in assessing effects on historic properties, but not included in the body of this report, are summarized in Table 5. The effects assessments and resultant finding of effect for each of these properties is presented in Table 6.

Table 5. References Key – Assessment of Effects

Title	Description	Abbreviation Key⁹
Project Plans		
Blue Line LRT Extension: Volume 1	Plans and sections	Vol. I
Blue Line LRT Extension: Volume 2	Rendered views	Vol. II
Blue Line LRT Extension: Volume 3	Index sheets for sections along BNSF Rwy. corridor	Vol. III
Blue Line LRT Extension: Volume 4	Raw sections along BNSF Rwy. corridor	Vol. IV
Blue Line LRT Extension: Volume 5	Rendered sections along BNSF Rwy. corridor	Vol. V
Blue Line LRT Extension: Volume 6	Rendered elevations	Vol. VI
Blue Line LRT Extension: Volume 7	Typical station platform	Vol. VII
Blue Line LRT Extension: Volume 8	Existing Plymouth Avenue bridge plans	Vol. VIII
Blue Line LRT Extension: Volume 9	TPSS locations and technical information	Vol. IX
Blue Line LRT Extension: Volume 10	Supplemental renderings, plans, and sections	Vol. X
Technical Studies		
Noise and Vibration Effects on Historic and Cultural Resources	Technical memo on Project noise and vibration impacts on historic properties adjacent to the Project alignment	N&V Memo
BLRT Section 106 Historic Properties – Traffic/Access Impacts	Technical memo on Project traffic and access impacts on historic properties in the APEs for the Penn, Plymouth, Golden Valley Road, and Robbinsdale stations	T&A Memo
METRO Blue Line Extension (Bottineau LRT) Phase 1: Station Area Planning, Van White Boulevard and Penn Avenue Stations	Station area plans for the Van White Boulevard and Penn Avenue Stations, which are located along TH 55	SAPVWP
METRO Blue Line Extension (Bottineau LRT) Phase 1: Station Area Planning, Plymouth Avenue and Golden Valley Road Stations	Station area plans for the Plymouth Avenue and Golden Valley Road Stations, which are located along the BNSF Rwy. corridor, within / adjacent to Theodore Wirth Park	SAPPGV

⁹ When listed, numbers following an abbreviation refer to the sheet numbers of the corresponding document. For example, "Vol. II, 4-8" refers to Volume 2, Sheets 4-8.

Title	Description	Abbreviation Key ⁹
Robbinsdale Station Area Planning	PowerPoint Presentation on station area concepts for the Robbinsdale Station, presented at the public open house held in Robbinsdale on Oct 21, 2015	SAPR
Theodore Wirth Regional Park Cultural Landscape Study for the Blue Line Extension LRT Project	Cultural Landscape Study of the Theodore Wirth Park element of the Grand Rounds Historic District	TWCLS

Project Determination of Effect

Based on the results of the assessment of effect analysis conducted by MnDOT CRU under delegation from FTA, and in consultation with the MnSHPO and other consulting parties, which are documented above, FTA has found that the Project will result in:

- No Adverse Effect on eleven (11) historic properties; and
- An Adverse Effect on six (6) historic properties:
 - Wayman A.M.E. Church;
 - Floyd B. Olson Memorial Statue;
 - Grand Rounds Historic District;
 - Homewood Residential Historic District;
 - Osseo Branch of the StPM&M RR / GN Rwy. Historic District; and
 - West Broadway Avenue Residential Historic District.

Therefore, FTA has determined that the undertaking will have an Adverse Effect on historic properties that are listed, or are eligible for inclusion, in the NRHP. Appropriate measures to avoid, minimize, mitigate and resolve these adverse effects will be included in the Section 106 MOA based on FTA's continuing consultation with consulting parties. If additional historic properties should be identified, the process for FTA to consult with the MnSHPO and consulting parties concerning effects and resolving any adverse effects will be included in the Section 106 MOA.

Table 6. Effects Assessments and Effects Findings

Effects	Finding
Minneapolis Warehouse Historic District (HE-MPC-0441)	
<p>Direct Effects: All Project elements are completely outside the boundaries of the district, so it is anticipated that the Project will have no direct effects on the Warehouse Historic District and will therefore have no effect to the property’s location, design, material, or workmanship. All direct effects from the Target Field Station were considered and accounted for in the Section 106 review for the construction of that station (SHPO R&C No. 2011-1404).</p> <p>Indirect Effects: The Project guideway and associated infrastructure, such as the LRT bridge over the HERC driveway, will be visible from various points along the western/southwestern portions of the district. However, Project infrastructure will be at least a block away from the district. Therefore, any visual changes to the already densely developed setting will be minimal, and will have no effect on the property’s setting, feeling, or association.</p> <p>The Project will have an interline connection with the existing METRO Blue Line at the existing Target Field Station whereby the LRT trains already in operation on the Blue Line, instead of terminating at the Target Field Station, will continue on along the Project and vice versa, so introduction of Project operation will not substantially change the number of trains serving this station or noise levels. Any potential direct or indirect effects of development that would be potentially catalyzed by the Project around the Target Field station was accounted for by the Section 106 review for the construction of this already built station (SHPO R&C No. 2011-1404).</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: The Project will not result in any direct effects to the historic district and any potential indirect effects to the district as a result of this undertaking related to its use of the Target Field Station were previously considered and resolved through the Section 106 process for the construction of that already built station (SHPO R&C No. 2011-1404).</p>
References: Vol. X: 1	
StPM&M RR / GN Rwy. Historic District (XX-RRD-010)	
<p>Direct Effects: The Project will connect to an existing LRT bridge over the historic district at the western side of Target Field Station to access the station. As the connection is approximately 750-foot west of where the bridge crosses over the historic district and no changes are proposed to the bridge, the Project will not directly affect the historic district and will therefore have no effect to the property’s location, design, material, or workmanship.</p> <p>Indirect Effects: The Project will cross over the historic district on an existing LRT bridge located between the bridge carrying 5th Street North over the district and Target Field, which screens views of the LRT from the grade separation in which the historic district is located. Therefore, the Project will not alter views to and from the district. Moreover, any other potential effects from the Project’s use of the Target Field Station were accounted for by the Section 106 review for the construction of that already built station (SHPO R&C No. 2011-1404).</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: The Project will not result in any direct effects to the historic district and any potential indirect effects to the district as a result of this undertaking related to its use of the Target Field Station were previously considered and resolved through the Section 106 process for the construction of that already built station (SHPO R&C No. 2011-1404).</p>
References: n/a	

Effects	Finding
Northwestern Knitting Company Factory HE-MPC-8125)	
<p>Direct Effects: The Northwestern Knitting Company Factory is located roughly a quarter mile from the closest Project infrastructure, so it is anticipated that the Project will have no direct effects on this property. Therefore, the project will have no direct effect to the property’s location, design, material, or workmanship.</p> <p>Indirect Effects: The Northwestern Knitting Company Factory property is located at the southern edge of the architecture/history APE, roughly a quarter mile south of the alignment, so Project elements may be visible at a distance in some views from the property. The Project could potentially catalyze redevelopment around the Van White Boulevard Station that would be visible from this property.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: The Northwestern Knitting Company Factory and the proposed Project elements in its vicinity are located in an already densely developed setting. Given the distance between the property and Project elements (well over 1,000 feet), and the scale of intervening development, any visual effect of Project infrastructure on this property will be negligible. Since the Project will only be minimally visible from the property, the characteristics qualifying the Northwestern Knitting Company Factory for inclusion in the NRHP will not be altered in a manner that would diminish its integrity of setting, feeling, or association.</p> <p>A number of parking lots and open parcels of land are located near the Northwestern Knitting Company Factory. Based on station area planning studies, introduction of the Project could potentially catalyze the redevelopment of these properties, which would cause changes to the setting of the Northwestern Knitting Company Factory. However, transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. If these areas are redeveloped, the factory historically had other buildings—as opposed to parking lots—surrounding it, so the redevelopment would not change views from the historic property in a manner that would diminish its setting in a way that would affect its ability to convey its historic significance.</p>
<p>References: <i>Figure 8</i>; SAPVWP: Section 2</p>	

Effects	Finding
Sumner Branch Library (HE-MPC-8081)	
<p>Direct Effects: The Project's LOD extends along the southern boundary of the library, so the Project will not infringe on this property. Therefore, the project will have no direct effects on this property.</p> <p>Indirect Effects: The Project alignment will be located in the center median of TH 55 in front of the library and the Van White Boulevard Station will be located in the center median, across Van White Memorial Boulevard from the library, so Project infrastructure and trains will be highly visible from the library. Operation of the Project will also introduce noise from LRVs and station operations, as well as potential changes in access to the library. The Project may also catalyze potential redevelopment of nearby properties or the library itself.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: While Project infrastructure, including the Van White Boulevard Station, will be added to the immediate setting of the library, the nature and scale of this infrastructure, combined with its distance from the library (the station will be located approximately 320 feet away), will allow views of the library to remain intact. To ensure that the visual prominence of the library will not be diminished by the Project, and that it will maintain its stature as a visual anchor of the intersection of TH 55 and Van White Memorial Boulevard, the Project will design its infrastructure in the vicinity of the library in accordance with the SOP's Standards, and will therefore have no adverse effect to the property's setting, feeling or association. In addition, the Project will prepare and implement a construction protection plan to document measures to be taken to avoid any direct effects to Sumner Library during Project construction.</p> <p>Given the proximity of the library to the Van White Boulevard Station, station area planning studies have indicated a strong potential for redevelopment to be catalyzed by this station in the vicinity of the historic property. While new development could cause changes to the setting of the library, it would not alter characteristics of the library that qualify it for the NRHP. The library itself is also included in the group of properties identified in a station area planning study completed in coordination with the Project as part of a planned neighborhood commercial node around the Van White Station. Properties included in this node are proposed to be up zoned to allow for increased density (five or more stories), mixed-use development. However, the Sumner Branch Library is unlikely to be subjected to any redevelopment pressure as it is in public ownership and use. Moreover, it is also designated by the City of Minneapolis as a local landmark, which affords it additional protection both by requiring all alterations to the exterior of the building, the site, and some portions of the interior to be reviewed by the Minneapolis Heritage Preservation Commission for compatibility with the historic character of the property. This designation further sets a high threshold for demolition. Per the City of Minneapolis' Heritage Preservation ordinance, the City can only approve the demolition of a historic property if "the demolition is necessary to correct an unsafe or dangerous condition on the property, or that there are no reasonable alternatives to the demolition. In determining whether reasonable alternatives exist, the commission shall consider, but not be limited to, the significance of the property, the integrity of the property and the economic value or usefulness of the existing structure, including its current use, costs of renovation and feasible alternative uses" (Minneapolis Code of Ordinances 23, §599.480[b]).</p> <p>The existing traffic signals (semaphores) and crosswalks that currently exist at the intersection of TH 55 and Van White Memorial Boulevard will be reconstructed as part of the Project, thereby maintaining access to the library. Per FTA criteria, the library is a Category 3 noise receptor. A noise analysis completed for the Project has determined that LRT operation will not result in a noise impact to the library.</p> <p>With the implementation of the measures identified above to minimize potential effects on the library, and avoid an adverse effect, all of which will be documented in the Section 106 MOA for the Project, a finding of No Adverse Effect has been made for the Sumner Branch Library.</p> <p>Avoidance and Minimization Measures to be included in the Project MOA:</p> <ul style="list-style-type: none"> • Design Project infrastructure in the vicinity of the library in accordance with the SOP's Standards • Prepare and implement a construction protection plan for the library
References: Vol. I: 1-2; Vol. VI: 2; Vol. X: 2-3; N&V Memo; SAPVWP: Section 2	

Effects	Finding
Wayman A.M.E. Church (HE-MPC-8290)	
<p>Direct Effects: In the vicinity of the church, the Project's LOD is limited to the TH 55 ROW limits, so it will have no direct effects on this property.</p> <p>Indirect Effects: There is an intervening two-story addition to the church between the NRHP-eligible church building and the Project alignment that will block views of the Project from the church. Operation of the Project will introduce noise from LRVs and station operations. There is the potential that the Project will catalyze the redevelopment of nearby properties or the church itself.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: Per FTA criteria, the church is a Category 3 noise receptor. A noise analysis completed for the Project has determined that LRT operation will not result in a noise impact to the church. This combined with the fact that the church is not within the viewshed of the Project means that Project noise will not affect the setting, feeling or association of the property.</p> <p>Station area planning studies completed in coordination with the Project have indicated a strong potential for redevelopment to be catalyzed by the Project in the vicinity of this historic property. In general, transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. However, a planning study completed in coordination with the Project identifies the church as part of a group of properties proposed to be up zoned to allow for increased density (five or more stories), mixed-use development in order to create a planned neighborhood commercial node around the Van White Station. As a result, development pressure created in part by the construction and operation of the Project may lead to changes to the setting of the church and potential alteration or demolition of this property. While new development in the setting would not alter characteristics that qualify the church for the NRHP, alteration would likely diminish the property's historic integrity and demolition would destroy the historic property. As redevelopment of this historic property is a reasonably foreseeable cumulative effect of the Project, a finding has been made that the Project will have an Adverse Effect on the Wayman A.M.E. Church. The adverse effect of the Project on this historic property will require resolution through consultation with MnSHPO and other consulting parties.</p>
<p>References: Vol. I: 3-4; Vol. VI: 2; Vol. X: 2-3; N&V Memo; SAPVWP: Section 2</p>	

Effects	Finding
Labor Lyceum (HE-MPC-7553)	
<p>Direct Effects: In the vicinity of the Labor Lyceum, the Project's LOD is limited to the TH 55 ROW limits, so it will have no direct effects on this property.</p> <p>Indirect Effects: The Project alignment will be located in the center median of TH 55 in front of the Labor Lyceum, so Project infrastructure and trains will be highly visible from the library. Operation of the Project will also introduce noise from LRVs and station operations, and potential changes in access. The Project may also catalyze potential redevelopment of nearby properties.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: While Project infrastructure will be added to the immediate setting of the Labor Lyceum, the nature and scale of this infrastructure, combined with its distance from the historic property, will allow views of the Labor Lyceum to remain intact. To ensure that the visual prominence of the Labor Lyceum is maintained and its integrity of setting, feeling, and association is not diminished by the Project, the Project will design its infrastructure in the vicinity of this historic property in accordance with the SOI's Standards.</p> <p>Station area planning studies have indicated a strong potential for redevelopment to be catalyzed by the Project around the Penn Avenue Station (which is located 930 feet away) and in the vicinity of this historic property; however, the Labor Lyceum itself is not among the properties identified in the station area plan for redevelopment. Transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances, so it may or may not occur. If redevelopment does occur around the Penn Station, it may lead to changes in the setting of the Labor Lyceum, but not in a manner that would alter characteristics of the historic property that qualify it for the NRHP.</p> <p>Per FTA criteria, the Labor Lyceum is a Category 3 noise receptor. A noise analysis completed for the Project has determined that LRT operation will not result in a noise impact to this historic property. There will be no change in vehicular access to this property as a result of Project construction. However, there will be a minor change in pedestrian access. An existing crosswalk on TH55 at Logan Avenue will be removed. This will require pedestrians to utilize a crosswalk one block to the west at Morgan Avenue to access the Labor Lyceum from south of TH 55. However, access will be maintained and this change will not alter characteristics of the property that qualify it for the NRHP.</p> <p>With implementation of the measure identified above to minimize potential effects on Labor Lyceum, and avoid an adverse effect, all of which will be documented in the Section 106 MOA for the Project, a finding of No Adverse Effect has been made for the Labor Lyceum.</p> <p>Avoidance and Minimization Measures to be included in the Project MOA:</p> <ul style="list-style-type: none"> • Design Project infrastructure in the vicinity of the Labor Lyceum in accordance with the SOI's Standards
<p>References: Vol. I: 5-6; Vol. VI: 3-4; Vol. X: 2-3; T&A Memo; SAPVWP</p>	

Effects	Finding
Floyd B. Olson Memorial Statue (HE-MPC-9013)	
<p>Direct Effects: A portion of the NRHP-eligible property along its northern boundary will be acquired to construct the Project. The portion of the plaza that will be acquired, which is largely green space, will be destroyed and incorporated into a widened TH 55 and sidewalk for the Project. The statue itself will not be directly affected, only the northern edge of its plaza.</p> <p>Indirect Effects: The BLRT and associated infrastructure, including a new station, will be highly visible from the Memorial and may catalyze the redevelopment of nearby properties. There is not expected to be any difference in vehicular traffic along TH 55 as a result of the BLRT.</p> <p>The Project alignment and Penn Avenue Station will be located in the center median of TH 55 in front of the statue. Consequently, Project infrastructure and trains will be highly visible from the statue and views of the statue from TH 55 will be obscured. The Project may also catalyze potential redevelopment of nearby properties and within the NRHP-eligible boundaries for this historic property.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: The incorporation of a portion of the property’s formal plaza into a street and sidewalk will result in the destruction of portions of the designed landscape in which the statue is situated, and of which the statue is the focal point. Portions of the formal yard in front of the statue, which is an important landscape divider within the site and statue’s setting, as well as the formal walk leading to the statue, which is the primary circulation network within the historic property, will be destroyed as a result of the Project’s infringement onto the historic property. Both of these features are important characteristics of the historic property’s designed landscape and the statue’s setting. These direct physical changes to the designed landscape will also alter important spatial relationships and result in changes to the way the statue is experienced and perceived within both its immediate and larger settings. As a result of these changes, the Project will directly diminish the Floyd B. Olson Memorial Statue property’s integrity of design, setting, and feeling. The introduction of the Penn Station directly in front of the historic property will also disrupt views and the visual connection between the statue and TH 55, which is an important historic characteristic of the historic property. This will further diminish the historic property’s integrity of setting, feeling, and association.</p> <p>Station area planning studies completed in coordination with the Project indicated a strong potential for redevelopment to be catalyzed by the Project on, and in the vicinity of, this historic property due to its proximity to the Penn Avenue Station. In general, transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. However, the planning study completed in coordination with the Project identifies the historic property as a property to be redeveloped in order to increase density around the Penn Station and it proposes to incorporate the Floyd B. Olson Memorial Statue itself into a small plaza within the future redevelopment on the property. The plan also identifies the redevelopment of adjacent properties. This redevelopment of the historic property would destroy the immediate setting of the historic property and severely alter, or sever its critical visual connection with TH 55, which is an important aspect of its integrity of association. The redevelopment of adjacent property would further diminish the visual connection and, as a result, its association with TH 55.</p> <p>In summary, per 36 CFR § 800.5(a), the Project will cause both direct and indirect adverse effects on the Floyd B. Olson Memorial Statue, including the destruction of a portion of the eligible site, thereby altering characteristics qualifying a property for inclusion in the NRHP in a manner that diminishes its integrity. Therefore, a finding of Adverse Effect has been made for the Floyd B. Olson Memorial Statue. The adverse effects of the Project on this historic property will require resolution through consultation with MnSHPO and other consulting parties.</p>
<p>References: Vol. I: 7-8; Vol. VI: 4; Vol. X: 2-3; T&A Memo; SAPVWP: Section 3</p>	

Effects	Finding
Osseo Branch of the StPM&M RR / GN Rwy. Historic District (HE-RRD-002; segments: HE-BPC-0084, HE-CRC-0238, HE-RBC-0304, HE-MPC-16389)	
<p>Direct Effects: The historic property is an approximately 13-mile long linear corridor that is generally 100-feet in width, with a track on a slightly raised roadbed running down the center of the 100-foot wide ROW. The Project will be constructed within the BNSF Rwy.-owned ROW along an approximately eight (8) mile long segment of the district, from TH 55 northwest to 73rd Avenue North in Brooklyn Park, where the LRT alignment diverts from the railroad ROW. Along this segment, the Project will acquire the eastern half of the ROW for the project alignment. The existing BNSF Rwy. track will be removed and reconstructed along an alignment approximately 25-feet to the west of its present alignment, roughly in the center of the western half of the BNSF Rwy. ROW. One exception is where it will remain on its existing alignment for a short stretch in Golden Valley, just north of the Golden Valley Road Station. The Project will construct its infrastructure, including two (2) light rail tracks, overhead power system, five (5) stations, three (3) vertical circulation towers, multiple TPSS and signal bungalows, various safety treatments, bridges, lighting, etc. in the eastern half of the ROW. New stations will be present within the corridor while reconstructed bridges will cross directly over it. The bluffs that define the edges of portions of the corridor will be partially altered to accommodate new retaining walls and sufficient space for the BLRT. Some vegetation within the corridor will be removed. In addition, along the entire length of the historic district that it will co-share with BNSF Rwy. freight track, the Project will construct a corridor protection barrier between the freight rail track and light rail track. Three types of corridor protection barriers will be utilized along various portions of the co-shared segment of the historic district. Types of corridor barriers include a wall that would be six-feet tall and two-feet thick, a wide ditch (35-to-40-feet between the centerlines of the freight rail and southbound light rail track), or a retained embankment whereby the freight rail and light rail tracks would be grade separated with LRT on an elevated roadbed held by a retaining wall that is at least six-feet tall. The existing high-voltage transmission line (HVTL) located along the eastern side of the existing tracks will be removed from the eastern edge of the corridor and replaced on the western side of the ROW. The steel-truss towers supporting the wires will be replaced by monopoles.</p> <p>Indirect Effects: The Project may catalyze the redevelopment of properties near light rail stations along the historic district, which could result in potential changes to the setting of the district.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: The exiting jointed rail track with wood ties, which is in its historic alignment and includes contributing track structure (rail), is being removed. The freight rail alignment will be relocated and two new LRT tracks comprised of heavily ballasted welded ribbon rail and concrete tie construction will be placed in the historic district, along with a substantial amount of new infrastructure, such as the overhead power system, stations and fencing, that is not in keeping with the branch-line character of the district. Corridor protection barriers will further alter the district. Collectively, relocation of the freight tracks, loss of historic fabric, and the introduction of Project infrastructure into the district will alter the perception of the corridor as an historic, isolated freight line into that of a dense, multi-purpose combined freight and transit rail corridor and will introduce passenger rail stations to a stretch of rail corridor that has never before had passenger rail facilities. The undertaking will alter characteristics of the Osseo Branch qualifying it for inclusion in the NRHP in a manner that will diminish the property's integrity of design, materials, setting, workmanship, feeling, and association.</p> <p>Based on station area planning studies, introduction of the Project could potentially catalyze the redevelopment of properties near light rail stations around the historic district, which would cause changes to the setting of the district. While transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. Moreover, even if development does occur, it would not diminish the district setting in a way that would affect its ability to convey its significance.</p> <p>In summary, per 36 CFR § 800.5(a), the Project will cause direct adverse effects on the Osseo Branch of the StPM&M Rwy. / GN Rwy. Historic District, including the substantial alteration and destruction of a significant portion of the eligible historic district (over 60 percent of the length of this linear historic district), thereby altering characteristics qualifying the property for inclusion in the NRHP in a manner that diminishes its integrity. Therefore a finding of Adverse Effect has been made for the Osseo Branch of the StPM&M Rwy. / GN Rwy. Historic District. The adverse effects of the Project on this historic district will require resolution through consultation with MnSHPO and other consulting parties.</p>
References: Vol. I: 9-39; Vol. II; Vol. III; Vol. IV; Vol. V; Vol. VI: 5-16; Vol. VII; Vol. IX; Vol. X: 4-10	

Effects	Finding
Grand Rounds Historic District (XX-PRK-0001), Theodore Wirth Segment	
<p>Direct Effects: The Project will acquire a portion of Theodore Wirth Regional Park, including up to one-half (0.5) acre at both the Plymouth Avenue and Golden Valley Road stations for the stations, approximately one-and-a-half (1.5) acres for a park-and-ride facility at the Golden Valley Road Station, as well as some smaller areas along the alignment. In addition, the Project will make a wide number of physical alterations to this large contributing element to the Theodore Wirth Segment of the Grand Rounds Historic District, as well as other more minor indirect effects to other contributing elements of the Theodore Wirth Segment of the historic district. The Grand Rounds Historic District is approximately 4,662 acres; the Theodore Wirth Segment of the district is approximately 755.4 acres; and the portion of Theodore Wirth Regional Park that is within the Grand Rounds Historic District, is approximately 677.1 acres. The portion of the Theodore Wirth Segment that is affected by this Project is approximately 246.2 acres, of which 233.5 acres are within the portion of Theodore Wirth Regional Park that is included in the historic district; totaling approximately 5.3% of the larger Grand Rounds Historic District that will be affected by the Project.¹⁰ Many, but not all of these alterations will be within the BNSF Rwy. ROW through the park. Alterations include the removal of vegetation from the BNSF Rwy. ROW and adjacent areas in the park, alteration of the topography, as well as the construction of the LRT guideway and the realigned freight track, corridor protection barriers between the freight rail and light rail lines (combination of walls, grade separations, and wide ditches). Two stations (Plymouth Avenue and Golden Valley Road), both with vertical circulation towers, will be constructed within the boundaries of Theodore Wirth Park. A 100 space park-and-ride lot will be constructed adjacent to the Golden Valley Road Station, within the park at its northern entrance from Wirth Parkway. Two bridges extending into and running through the park will be demolished and reconstructed. The existing HVTL in the BNSF Rwy. ROW through the park will be removed from the eastern edge of the corridor and replaced on the western side. A segment of Bassett Creek in the park, near Plymouth Avenue, will also be altered, relocating it from its existing channel to a new channel in order to accommodate the relocation of an existing park trail from the BNSF Rwy. ROW into the park land. Along the reconstructed segment of the channel, the channel will be slightly narrowed and the natural, earthen bank of the extant channel will be replaced on one side by a retaining wall.</p> <p>Indirect Effects: Project infrastructure, as well as other associated improvements and alterations to the landscape within, adjacent to, and in the vicinity of the Grand Rounds Historic District will alter the visual character of the district, and viewsheds and views within the district, including designed viewsheds. The vertical circulation structure at the Plymouth Avenue Station will be particularly noticeable and will be present within the Theodore Wirth Regional Park's most important viewshed, especially so when the structure is lit at dusk. There is also potential for development to be catalyzed outside of the district around the Plymouth Avenue and Golden Valley Road stations. Operation of the Project will also introduce noise from LRVs and station operations. There will be a slight increase in vehicular traffic along the various roads that access the property.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: Direct effects will physically alter the entire eastern edge of Theodore Wirth Regional Park, as well as its northern edge where Wirth Parkway, another contributing element, enters the park. In addition, two historic entry points to the Theodore Wirth Segment are also being demolished and reconstructed, or substantially altered from natural to developed spaces. All of this work will not only alter the cultural landscape of the Theodore Wirth Segment of the Grand Rounds Historic District, it will also introduce new, contemporary elements to these portions of the historic district. New visual elements will be in the form of formal, engineered structures such as retaining walls, the LRT guideway and overhead power system, stations, vertical circulation towers, a parking lot, and other elements to the otherwise naturalistic setting of the park's landscape. Illumination of the stations and vertical circulation towers will also change the visual character of the otherwise dark nature of natural areas within the district at night. In addition, the introduction of Project elements will alter key viewsheds and views within Theodore Wirth Regional Park, including the most prominent viewshed within it, which is that from one of the character defining features, the Theodore Wirth Chalet. Collectively the direct physical effects to the Theodore Wirth Segment of the Grand Rounds Historic District, and related resultant indirect visual effects, will alter historic characteristics that qualify this segment of the district for the NRHP by diminishing its integrity design, setting, materials, workmanship, feeling, and association.</p> <p>Station area planning studies have shown low potential for the Golden Valley Road Station to catalyze development that could change the setting of the district. A traffic analysis has also shown a slight increase in vehicular traffic along the various roads that access the historic district, none of which would diminish any aspect of integrity of the district property. In addition, while noise from LRVs and stations will be perceptible in portions of the district, per FTA criteria, the noise will not be of sufficient levels to alter characteristics that qualify the historic district, or its contributing elements, for the NRHP.</p> <p>In summary, per 36 CFR § 800.5(a), the Project will cause both direct and indirect adverse effects on the Theodore Wirth Segment of the Grand Rounds Historic District, thereby altering characteristics qualifying this segment of the historic district for inclusion in the NRHP in a manner that diminishes its integrity. Therefore a finding of Adverse Effect has been made for the Grand Rounds Historic District. The adverse effects of the Project on this historic district will require resolution through consultation with MnSHPO and other consulting parties.</p>

¹⁰ The Theodore Wirth Segment of the Grand Rounds Historic District encompasses 755.4 acres, of which 246.2 acres (approximately one-third of this segment, or approximately 5.3 percent of the land area in the historic district) will be affected, directly and/or indirectly, by the Project. The majority of this area is located with Theodore Wirth Regional Park. Approximately 677.1 acres of the approximately 760-acre Theodore Wirth Regional Park are included in the Grand Rounds Historic District. Of the portion of the park that is included in the Grand Rounds Historic District, 233.5 acres (approximately 34.5 percent of the eligible portion of the park) will be effected by the Project (228.6 acres are within the architecture/history APE and an additional 4.9 acres are part of defined historic viewsheds that are included in the APE, but continue beyond the APE limits).

Effects	Finding
References: Vol. I: 9-19; Vol. II: 1-2; Vol. III: 1-4; Vol. IV: 1-12; Vol. V: 1-21; Vol. VI: 5-8; Vol. VIII; Vol. X: 5-6; T&A Memo; N&V Memo; TWCLS	
Homewood Residential Historic District (HE-MPC-12101)	
<p>Direct Effects: The Project's LOD is mostly located just west of the western boundary of the historic district, within the BNSF Rwy. ROW that is inside the boundaries of Theodore Wirth Park, which is adjacent to the Homewood Residential Historic District. However, the LOD does include a very small portion of a street within the Homewood Residential Historic District at its extreme southwest corner. In this area a retaining wall will be constructed downslope from the street, and a small portion of the street (with an area less than 500-square-feet) will be reconstructed.</p> <p>Indirect Effects: Project elements, such as the reconstructed Plymouth Avenue Bridge and the Plymouth Avenue Station will be visible from the district as the Project guideway and other associated infrastructure will run within the BNSF Rwy. corridor directly west of the district. Operation of the Project will also introduce noise from LRVs and station operations. The Project may catalyze the redevelopment of properties adjacent to or within the district with potentially three blocks of medium-density residential recommended from station area planning efforts.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: Per FTA criteria, the district is a Category 2 noise receptor. A noise analysis completed for the Project indicates that without mitigation, LRT operations would cause a moderate noise impact on three residences at the southwestern corner of the historic district. As a residential district with properties experiencing moderate noise effects, the Project will diminish the district's integrity of setting and feeling. The noise analysis indicates that the three residences meet the threshold for mitigation, so appropriate measures to mitigate this adverse effect will need to be considered for implementation.</p> <p>While Project infrastructure will be added to the immediate setting of the historic district, as well as to a very small portion of its southwest corner, much of this infrastructure is located in a trench below the bluff on which the western edge of the historic district is situated. Given that much of this infrastructure will be below direct views and also somewhat screened by existing vegetation, these Project elements will not diminish the setting of the district. The small portion of roadway within the historic district that is being removed and reconstructed will be rebuilt in kind, so that Project elements will similarly avoid diminishing the setting of the district.</p> <p>Station area planning studies indicate low potential for the Plymouth Avenue Station to catalyze development that could change the setting of the district or cause potential changes to properties within the district. The only potential development site identified was a site that had been previously identified for redevelopment by the City of Minneapolis in its comprehensive plan (prior to station planning efforts), thus it is unrelated to LRT.</p> <p>In summary, operation of the Project will result in adverse auditory effects on the Homewood Residential Historic District. Therefore a finding of Adverse Effect has been made for the Homewood Residential Historic District. The adverse effect of the Project on this historic district will require resolution through consultation with MnSHPO and other consulting parties.</p>
References: Vol. I: 9-12; Vol. II: 2, 10-15; Vol. III: 1; Vol. IV: 3-5; Vol. V: 5-6; Vol. VI: 5, 7; Vol. VIII; N&V Memo	
Bridge No. L9327 (HE-GVC-0050)	
<p>Direct Effects: Bridge No. L9327 is located approximately 570-feet from the Project alignment, so it is anticipated that the Project will have no direct effects on this property.</p> <p>Indirect Effects: The Project will cause visual effects on the Bridge from the removal of vegetation and the introduction of new visual elements in the form of formal, engineered structures such as retaining walls, the LRT guideway and overhead power system, and potential illumination at night from the Plymouth Avenue Station to the otherwise naturalistic, park setting of the bridge. Operations will also introduce noise from LRVs and station operation.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: Bridge No. L9327 is individually eligible for the NRHP under Criterion C in the area of Engineering for its aesthetics. While Project infrastructure will be visible from the bridge, the introduction of Project elements to its setting will not alter characteristics of the bridge that qualify it individually for the NRHP. Moreover, given their distance from the bridge, Project elements will not diminish the setting, feeling and association of the bridge in a way that would preclude it from being able to convey its individual significance under NRHP Criterion C. In addition, per FTA criteria, the bridge is not a noise sensitive resource, so noise from Project operation will not have an effect on the bridge.</p> <p>The bridge is also located within, and is a contributing element to, the Grand Rounds Historic District, which will be adversely affected by the undertaking (see section on the Grand Rounds Historic District). However, the effects of the Project on the bridge as a contributing element to the historic district are limited to those described under its individual significance.</p> <p>In summary, the Project will cause minor indirect visual effects on Bridge No. L9327, however, they will not alter any of the characteristics of the bridge that qualify it for the NRHP in a manner that would diminish its historic integrity. Therefore, a finding of No Adverse Effect has been made for Bridge No. L9327 as an individual historic property.</p>
References: n/a	

Effects	Finding
Sacred Heart Catholic Church (HE-RBC-1462)	
<p>Direct Effects: The church is located approximately 300-feet from the Project alignment’s centerline and approximately 130-feet from its LOD, so the Project will have no direct effects on this property.</p> <p>Indirect Effects: The Project alignment will be located in the BNSF Rwy. ROW, approximately 300-feet west of the historic property. The Project guideway and associated infrastructure, including a large, multi-level park-and-ride structure located a block away along the Hubbard Avenue viewshed, will be visible from the property. Operation of the Project will also introduce noise from LRVs and station operations. There is the potential that the Robbinsdale Station could catalyze the redevelopment of nearby properties.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: The introduction of Project infrastructure to the church’s setting will not visually or physically separate the property from its downtown Robbinsdale setting. Given the distance of Project elements from the historic property, when also considered with their nature and scale, the Project will cause a negligible change to the property’s setting and will not diminish its integrity of feeling or associations.</p> <p>Per FTA criteria, the church is a Category 3 noise receptor. A noise analysis completed for the Project indicates that without mitigation, the Project would cause a severe auditory impact in this historic property from LRT horns at nearby grade crossings. The noise analysis indicates that the implementation of quiet zones will eliminate all auditory impacts on the church. Therefore, the Project will implement quiet zones for the 41st Avenue North and 42nd Avenue North grade crossings to avoid an adverse auditory effect on the church. With implementation of this measure to minimize potential effects on the church, and avoid an adverse effect, which will be documented in the Section 106 MOA for the Project, a finding of No Adverse Effect has been made for Sacred Heart Church.</p> <p>Avoidance and Minimization Measures to be included in the Project MOA:</p> <ul style="list-style-type: none"> • Implement quiet zones for the Project’s 41st Avenue North and 42nd Avenue North grade crossings
<p>References: Vol. I: 23; Vol. II: 3, 28-31; Vol. III: 6; Vol. IV: 13; Vol. V: 26; Vol. X: 7; T&A Memo; N&V Memo</p>	

Effects	Finding
Robbinsdale Waterworks (HE-RBC-286)	
<p>Direct Effects: The Project's LOD extends along the northwest and southwest boundaries of the waterworks, but will not infringe on the historic property, so the Project will have no direct effects on this property.</p> <p>Indirect Effects: Project infrastructure will be located adjacent, and in close proximity, to the waterworks. The Project alignment will be located in the BNSF Rwy. ROW, approximately 100-feet away across a surface parking lot from the waterworks. The Robbinsdale Station and a large, multi-level park-and-ride structure that includes street level transit oriented development and a parking ramp on the upper levels will be constructed approximately 200-feet northwest of the waterworks property. The existing parking lot adjacent to the southwest boundary of the historic property will also be reconstructed. Operation of the Project will introduce noise from LRVs and station operations. There is the potential that the Robbinsdale Station could catalyze the redevelopment of nearby properties.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: Vibration analysis indicates that construction and operation of the Project will not affect the property; however, the Project will prepare and implement a construction protection plan to document measures to be taken to avoid any direct effects to the waterworks during Project construction. Per FTA criteria, the waterworks is not a noise sensitive resource, so noise from Project operation will not affect characteristics that qualify the waterworks for the NRHP.</p> <p>While the Project will introduce a variety of new elements adjacent to the historic property and also within its setting, the Project elements will not diminish the ability of the water tower to serve as the visual focal point of downtown Robbinsdale. To ensure that the Project elements do not diminish the setting, association or feeling of the waterworks, that the visual prominence of the water tower is not diminished, and that the property will maintain its stature as the visual anchor of downtown Robbinsdale, the Project will design its infrastructure in the vicinity of the waterworks in accordance with the SOI's Standards.</p> <p>Given the proximity of the waterworks to the Robbinsdale Station, planning studies have indicated a strong potential for redevelopment to be catalyzed by this station in the vicinity of the historic property. However, transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. If new development does occur, it could cause changes to the setting of the waterworks; however, it would not alter characteristics of the waterworks that qualify it for the NRHP. It should be noted that the waterworks itself would not be subjected to any redevelopment pressure as it is in public ownership and use, and as it serves an infrastructure use, it would be cost prohibitive to relocate its function elsewhere.</p> <p>With the implementation of the measures identified above to minimize potential effects on the waterworks, and to avoid an adverse effect, all of which will be documented in the Section 106 MOA for the Project, a finding of No Adverse Effect has been made for the Robbinsdale Waterworks.</p> <p>Avoidance and Minimization Measures to be included in the Project MOA:</p> <ul style="list-style-type: none"> • Design Project infrastructure in the vicinity of the waterworks in accordance with the SOI's Standards • Prepare and implement a construction protection plan for the library
<p>References: Vol. I: 23-24; Vol. II: 3, 28-31; Vol. III: 6; Vol. IV: 13-14; Vol. V: 27; Vol. VI: 9-12; Vol. X: 7; N&V Memo</p>	

Effects	Finding
Hennepin County Library, Robbinsdale Branch (HE-RBC-024)	
<p>Direct Effects: The Project's LOD extends along the north and northeast boundaries of the library, so the Project will not infringe on the historic property. The Project will have no direct effects on this property.</p> <p>Indirect Effects: Project infrastructure, including the guideway, Robbinsdale Station, and a large, multi-story park-and-ride structure, will be highly visible from the property as they will be located immediately across Railroad Avenue from the library, within and extending beyond the BNSF Rwy. ROW to the east. In addition, 42nd Avenue North, including sidewalks and the boulevard, will also be reconstructed in front of the library. Operation of the Project will also introduce noise from LRVs and station operations, and changes in access to the library.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: Vibration analysis indicates that construction and operation of the Project will not affect the property; however, the Project will prepare and implement a construction protection plan to document measures to be taken to avoid any direct effects to the library during Project construction.</p> <p>The amount of Project elements, when their size, scale, and massing is considered, will alter the property's setting. This infrastructure will also significantly change the property's viewshed towards downtown Robbinsdale as the park-and-ride structure will introduce a large visual barrier that is of a different scale (much larger) than existing development within the library's setting. As a result, this will diminish the setting of the library and its feeling and association. To minimize the visual effects of Project elements on the library, and avoid an adverse visual effect, the Project will design its infrastructure in the vicinity of the library in accordance with the SOI's Standards. Given the proximity of the library to the Robbinsdale Station, station area planning studies have indicated a strong potential for redevelopment to be catalyzed by this station in the vicinity of the historic property. However, transit development is an indirect catalyst for redevelopment, redevelopment opportunities are primarily based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. If new development does occur, it could cause changes to the setting of the library; however, most views of any potential development would be screened by the Project's park-and-ride structure.</p> <p>The Project will also cause minor changes in access to the library from the downtown. While the existing BNSF Rwy. freight rail line already separates the property from downtown Robbinsdale, introduction of the Project will result in two new, additional rail tracks with much more frequent operations. The Project will also cause a minor change in vehicular access to the library. In order to reconstruct the 42nd Avenue North grade crossing to accommodate LRT, the intersection of 42nd Avenue North and Railroad Avenue must be reconstructed with a center median in 42nd Avenue through the intersection. This will prevent westbound vehicles from turning on Railroad Avenue to access the library, but access will be maintained by driving around the block and via the alley adjacent to the library. Access from the west and south will not change.</p> <p>Per FTA criteria, the library is a Category 3 noise receptor. A noise analysis completed for the Project indicates that without mitigation, the Project would cause a severe auditory impact in this historic property from LRT horns at nearby grade crossings. The noise analysis indicates that the implementation of a quiet zone will eliminate all auditory impacts on the library. Therefore, the Project will implement quiet zones for the 41st Avenue North and 42nd Avenue North grade crossings to avoid an adverse auditory effect on the library.</p> <p>With implementation of the measures identified above to minimize potential effects on the library, and avoid an adverse effect, all of which will be documented in the Section 106 MOA for the Project, a finding of No Adverse Effect has been made for the Hennepin County Library, Robbinsdale Branch.</p> <p>Avoidance and Minimization Measures to be included in the Project MOA:</p> <ul style="list-style-type: none"> • Design Project infrastructure in the vicinity of the waterworks in accordance with the SOI's Standards • Prepare and implement a construction protection plan for the library • Implement quiet zones for the Project's 41st Avenue North and 42nd Avenue North grade crossings
<p>References: Vol. I: 24-25; Vol. II: 3, 32-33; Vol. III: 6; Vol. IV: 15; Vol. V: 29; Vol. VI: 9-13; Vol. X: 7; T&A Memo; N&V Memo</p>	

Effects	Finding
West Broadway Avenue Residential Historic District (HE-RBC-158)	
<p>Direct Effects: The Project's LOD extends along the western boundary of the historic district, so the Project will have no direct effects on this historic district.</p> <p>Indirect Effects: The Project alignment will run directly adjacent to the western boundary of the district on an elevated roadbed and approach structure for the Project's bridge over TH 100. The trains and associated infrastructure will be highly visible from the rear of properties within the district that face the existing BNSF Rwy. ROW and a retaining wall will front the alley forming the district's western edge. The viewshed from the district across the existing BNSF Rwy. freight track will be blocked as a result of the higher elevation of the Project guideway. Operation of the Project will also introduce noise from LRVs and station operations, and potential changes in traffic patterns in the district.</p>	<p>Finding: Adverse Effect</p> <p>Rationale: The introduction of Project infrastructure and all its associated elements immediately adjacent to the entire western boundary of the West Broadway Avenue Residential Historic District will sever the district's visual connection across the existing BNSF Rwy. freight rail track to areas to the west. Additionally, Project infrastructure, including tall retaining walls to support the elevated guideway and the overhead power system, will introduce new, incompatible, and out-of-scale elements to the setting of the district. Due to the geometric requirements related to the Project's crossing over TH 100, the blocking of historic views from the district and the introduction of out-of-scale elements to the immediate setting of the historic district cannot be avoided. Collectively, these changes will diminish the historic district's integrity of setting and feeling.</p> <p>Per FTA criteria, the district is a Category 2 noise receptor. A noise analysis completed for the Project indicates that without mitigation, the Project would cause a severe auditory impact on some residences in the historic district, specifically from LRV horns at nearby grade crossings. As a residential district with properties experiencing moderate and severe noise effects, the Project will diminish the district's integrity of setting, feeling and association. The noise analysis indicates that implementation of quiet zones would eliminate severe auditory impacts on the district, but two residences would still have moderate impacts even with the implementation of quiet zones. Therefore, since the implementation of a quiet zone will not resolve the auditory impacts on all properties, Project noise will adversely affect the historic district. In summary, per 36 CRF § 800.5(a), the Project will cause adverse visual and auditory effects on the West Broadway Avenue Residential Historic District. Therefore, a finding of Adverse Effect has been made for the West Broadway Avenue Residential Historic District. The adverse effects of the Project on this historic district will require resolution through consultation with MnSHPO and other consulting parties.</p>
References: Vol. I: 26-29; Vol. II: 4, 34-35; Vol. III: 7; Vol. IV: 16-17; Vol. V: 30-34; Vol. VI: 13-14; T&A Memo; N&V Memo	
Jones-Osterhus Barn (HE-RBC-264)	
<p>Direct Effects: The closest Project infrastructure to the barn is located a half block (approximately 190-feet) to the west, so it is anticipated that the Project will have no direct effects on this property.</p> <p>Indirect Effects: Project elements such as support poles and catenary wires may be minimally visible from the property. There will be a minor increase in vehicular traffic in nearby streets.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: Project infrastructure will only be minimally, if at all, visible from the property and would result in a negligible change in one view from the barn. The barn is located more than a half mile from the nearest Project station. There will be no change in pedestrian/bicycle access to the property. Given the street network, there is no potential for cut-through traffic to access stations past the barn. Per 2040 projections, there will only be an additional 50 cars that would utilize the nearby portion of West Broadway Avenue if the Project is built compared to if it were not constructed. As a result of this, and the absence of direct effects, the undertaking will not alter any of the characteristics qualifying the Jones-Osterhus Barn for inclusion in the NRHP in a manner that would diminish its historic integrity, including its setting, feeling and association. Therefore, a finding of No Adverse Effect has been made for the Jones-Osterhus Barn.</p>
References: Vol. I: 30-31; T&A Memo	

Effects	Finding
M&P Rwy. / Soo Line Rwy. Historic District (HE-CRC-199)	
<p>Direct Effects: The existing diamond crossing where the BNSF Rwy. freight rail track crosses the historic Soo Line Rwy. track at-grade will be shifted and reconstructed in-kind approximately 25-feet west of its present location.</p> <p>Indirect Effects: The Project guideway will cross over this linear historic district on a new, 1,260-foot long bridge (260-foot span with 500-foot approaches on either side) that will clear span the 100-foot wide historic railroad ROW. The bridge and other associated LRT infrastructure will be visible along a short stretch of the historic district on either side of the crossing point.</p>	<p>Finding: No Adverse Effect</p> <p>Rationale: The realigned BNSF Rwy. freight rail track will continue to cross the former Soo Line Rwy. mainline track within the historic district, now owned by CP Rwy., at grade, thereby maintaining the historic at-grade crossing. While this will result in minor direct effects to the historic district, since the crossing will be reconstructed in-kind and within the historic ROW limits of both railroad lines, and will affect a relatively minute portion of the line (roughly a 100-to-150-foot long segment of an approximately 386.5-mile long linear historic district) these effects will not diminish the ability of the historic district to convey its significance. The LRT guideway will pass over the historic district on a bridge with a sufficiently large span to avoid directly affecting the historic district. The bridge will result in a visual effect on a segment of the historic district extending along either side of the new structure. However, at the Project crossing the historic district is located in a fully developed urban area that includes other grade separation structures. The visual effect will be limited to a short segment of an approximately 387-mile long linear historic district, so it will not diminish the district's integrity of setting, feeling, or association.</p> <p>In summary, the Project will cause minor direct and indirect effects on the M&P Rwy. / Soo Line Rwy. Historic District; However, they will not alter, directly or indirectly, any of the characteristics of the historic district that qualify it for the NRHP in a manner that would diminish its historic integrity. Therefore, a finding of No Adverse Effect has been made for the M&P Rwy. / Soo Line Rwy. Historic District.</p>
<p>References: Vol. I: 32-33; Vol. VI: 15-16</p>	

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106GROUP

THEODORE WIRTH REGIONAL PARK CULTURAL LANDSCAPE STUDY FOR THE BLUE LINE EXTENSION LRT PROJECT

Golden Valley and Minneapolis, Hennepin County, Minnesota

September 2015



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Golden Valley and Minneapolis, Hennepin County, Minnesota

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MANAGEMENT SUMMARY

From March to May of 2015, The 106 Group Ltd. (106 Group) conducted a cultural landscape study for the Theodore Wirth Regional Park (Theodore Wirth Park; HE-GVC-00081). The cultural landscape study was conducted under contract with HDR on behalf of the Metropolitan Council as part of the Blue Line Extension Light Rail Transit (BLRT) (previously known as Bottineau LRT) Final Environmental Impact Statement (FEIS). The proposed BLRT project is receiving funding from the Federal Transit Administration (FTA) and, therefore, must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act of 1966, as amended (Section 106). Metropolitan Council is completing the FEIS under the direction of the FTA for compliance with NEPA. The Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU) is acting on behalf of the FTA for many aspects of the Section 106 process.

The proposed BLRT project is an approximately 13-mile transit corridor connecting downtown Minneapolis with the northwest suburbs in order to improve regional mobility and meet long-range transit needs. The proposed alignment is located within the cities of Crystal, Brooklyn Park, Golden Valley, Minneapolis, and Robbinsdale. The proposed alignment runs near the eastern edge of Theodore Wirth Park within the existing right-of-way of the Osseo Branch Line of the St. Paul, Minneapolis & Manitoba (StPM&M)/Great Northern Railway (GN)/Burlington Northern Santa Fe Railway (BNSF) (Osseo Branch Line; HE-RRD-002 [this inventory number replaces inventory number XX-RRD-010 used in previous documentation and includes previously inventoried segments HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389]) between Highway 55 and Golden Valley Road. At Highway 55, the alignment curves east and runs down the center of the highway. Two transit stations are proposed along the portion of the alignment running within Theodore Wirth Park, one at Golden Valley Road and another at Plymouth Avenue. Both are located in the City of Golden Valley, Hennepin County. An Area of Potential Effect (APE) for architecture/history resources for the BLRT project was determined in consultation with MnDOT CRU and the Minnesota State Historic Preservation Office (MnSHPO) in 2011 as part of the *Bottineau Transitway Draft Environmental Impact Statement*, which includes: 500 feet on either side of proposed alignment; a 0.25-mile radius around proposed stations, modifications of existing structures, and new structures with the potential for pile driving; and a 500-foot radius around structures with proposed pier modifications without the potential for pile driving (106 Group 2011).

For compliance with Section 106, consultation is ongoing to assess the effects the BLRT project may have on historic properties within the APE. One historic property within the APE is Theodore Wirth Park, which is identified as a contributing resource to the Grand Rounds Historic District (GRHD). The current boundary of Theodore Wirth Park contains approximately 760 acres (307.6 hectares) of land in the municipalities of Minneapolis and Golden Valley, Hennepin County, Minnesota (Figure 1). The GRHD has been previously determined eligible for listing in the National Register of Historic Places (NRHP) by the MnSHPO. The GRHD is currently determined as eligible under Criterion A in the areas of Community Planning and Development and Entertainment/Recreation, and under Criterion C in the area of Landscape Architecture. Its period of significance is currently documented as 1884 to 1942, although the district is currently being evaluated by the MnSHPO and the Minneapolis Park and Recreation Board

(MPRB), which is unrelated to the BLRT project, to determine if it possesses significance within the period of 1943 to the mid-1970s, reflecting improvements developed in accordance with a 1971 plan by Eckbo, Dean, Austin and Williams. The boundaries of Theodore Wirth Park depicted in the draft NRHP nomination for the GRHD are slightly different than the current boundary for the park (Figure 1). For example, the boundary from the draft NRHP nomination excludes a portion of the Par 3 Golf Course and the area identified as the "Back 40," both located on the far western side of the park. There are also slight differences in the eastern boundary along Olson Memorial Highway. To ensure that all possible contributing features are identified, the focus of this study is the entirety of Theodore Wirth Park that is encompassed by both boundaries, the one from the draft NRHP nomination and the current Theodore Wirth Park boundary ("Study Area," see Figure 1). This study identifies features within the APE that may be affected by the BLRT project, both within the current period of significance from the draft NRHP nomination and the potential extension to 1975, to inform the analysis of effects and Section 106 consultation for the BLRT project. This study does not address other MPRB-owned properties or other historic properties that are located outside of the Study Area.

The specific purpose of this cultural landscape study includes the following:

- Provide a historic context for Theodore Wirth Park and document its developmental history to provide an understanding of the landscape features of the park (see Section 3).
- Identify viewsheds within Theodore Wirth Park where the BLRT project may be visible, including the four viewsheds specifically identified by the MPRB and MnDOT CRU, and identify any other viewsheds that may exist through field survey and comparing those areas to the current APE (see Section 4).
- Identify the physical characteristics of the landscape, including a broad overview across the entire park and specific details within the APE and viewsheds, using existing documents and field survey (see Sections 5.1 and 5.2).
- Identify contributing elements to the GRHD within the APE and viewsheds where properties may be affected by the proposed BLRT project (see Section 5.4).

A total of 41 features have been previously documented within the Study Area and corresponding inventory forms are on file at the MnSHPO. These resources are primarily evaluated within the current period of significance for the GRHD that ends in 1942. Of these 41 total features, 30 are identified in the draft NRHP nomination prepared in 2012 for the district. All 41 features are summarized in Appendix A. Elements such as topography, vegetation, and views and vistas, which are mentioned in the draft NRHP nomination but do not have separate inventory forms, are also part of the cultural landscape in Theodore Wirth Park and are included in this study. The resources identified in the current draft NRHP nomination for the GRHD, which is the basis for MnSHPO's determination of eligibility, are relied upon as a basis for identifying contributing and non-contributing features within the currently documented period of significance (ending in 1942) for the purposes of Section 106 compliance. Features dating between 1943 and 1975 are further documented by this cultural landscape study since these features have not been formally evaluated by previous studies. The current evaluation by MPRB and MnSHPO of contributing and non-contributing features during this extended timeframe may not be finished prior to completion of the Section 106 compliance review process for the BLRT project. Thus, this cultural landscape study also

identifies features dating within the extended timeframe (1943 to 1975) that appear to be contributing, to better inform the Section 106 compliance review process for the BLRT project. Parisa Ford, M.S., AICP, who meets the *Secretary of the Interior's Professional Qualifications Standards* for Architectural History and History, served as the principal investigator for this study.

The current architecture/history APE defined for the project captures all of the viewsheds of the BLRT project within the park except for one area in Theodore Wirth Golf Course, located north of Highway 55, encompassing approximately 5.5 acres. FTA/MnDOT CRU will determine what changes to the APE may be required. As a result of the survey and research completed for this cultural landscape study, a total of 14 features located within the APE and viewsheds of the BLRT project have been previously determined or appear to be contributing features to the GRHD.

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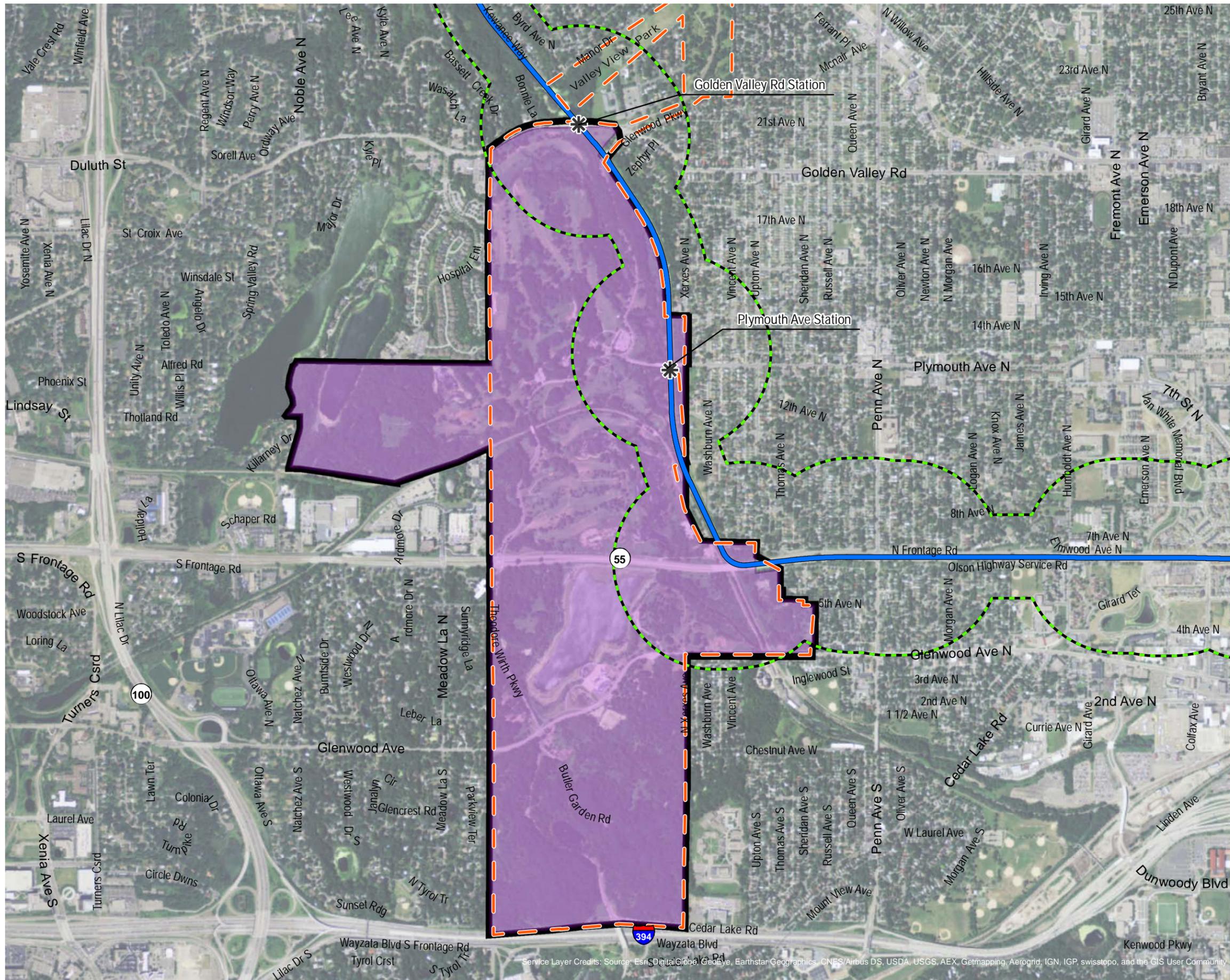
1.0 INTRODUCTION

From March to May of 2015, The 106 Group Ltd. (106 Group) conducted a cultural landscape study for the Theodore Wirth Regional Park (Theodore Wirth Park; HE-GVC-00081). The cultural landscape study was conducted under contract with HDR on behalf of the Metropolitan Council as part of the Blue Line Extension Light Rail Transit (BLRT) (previously known as Bottineau LRT) Final Environmental Impact Statement (FEIS). The proposed BLRT project is receiving funding from the Federal Transit Administration (FTA) and, therefore, must comply with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act of 1966, as amended (Section 106). Metropolitan Council is completing the FEIS under the direction of the FTA for compliance with NEPA. The Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU) is acting on behalf of the FTA for many aspects of the Section 106 process.

The proposed BLRT project is an approximately 13-mile transit corridor connecting downtown Minneapolis with the northwest suburbs in order to improve regional mobility and meet long-range transit needs. The proposed alignment is located within the cities of Crystal, Brooklyn Park, Golden Valley, Minneapolis, and Robbinsdale. The proposed alignment runs near the eastern edge of Theodore Wirth Park within the existing right-of-way (ROW) of the Osseo Branch Line of the St. Paul, Minneapolis & Manitoba (StPM&M)/Great Northern Railway (GN)/Burlington Northern Santa Fe Railway (BNSF) (Osseo Branch Line; HE-RRD-002 [this inventory number replaces inventory number XX-RRD-010 used in previous documentation and includes previously inventoried segments HE-BPC-0084; HE-CRC-0238; HE-RBC-0304; HE-MPC-16389]) between Highway 55 and Golden Valley Road. At Highway 55, the alignment curves east and runs down the center of the highway. Two transit stations are proposed along the portion of the alignment running within Theodore Wirth Park, one at Golden Valley Road and another at Plymouth Avenue. Both are located in the City of Golden Valley, Hennepin County. An Area of Potential Effect (APE) for architecture/history resources for the BLRT project was determined in consultation with MnDOT CRU and the Minnesota State Historic Preservation Office (MnSHPO) in 2011 as part of the *Bottineau Transitway Draft Environmental Impact Statement*, which includes: 500 feet on either side of proposed alignment; a 0.25-mile radius around proposed stations, modifications of existing structures, and new structures with the potential for pile driving; and a 500-foot radius around structures with proposed pier modifications without the potential for pile driving (106 Group 2011).

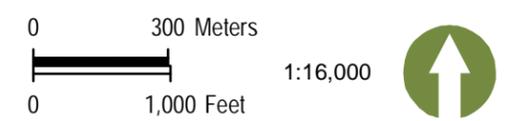
For compliance with Section 106, consultation is ongoing to assess the effects the BLRT project may have on historic properties within the APE. One historic property within the APE is Theodore Wirth Park, which is identified as a contributing resource to the Grand Rounds Historic District (GRHD). The Grand Rounds Historic District (GRHD) has been previously determined eligible for listing in the National Register of Historic Places (NRHP) by the MnSHPO. The district is currently determined as eligible under Criterion A in the areas of Community Planning and Development and Entertainment/Recreation, and under Criterion C in the area of Landscape Architecture.

Blue Line Extension LRT (BLRT)
Theodore Wirth Regional Park
Cultural Landscape Study
Minneapolis and Golden Valley, Minnesota



- Proposed Alignment
- ✱ Proposed Station
- Architecture/History Area of Potential Effect
- Current Park Area
- Grand Rounds Historic District - Theodore Wirth Segment*
- Study Area

* The Grand Rounds Historic District boundary for the Theodore Wirth Segment reflects the currently documented period of significance to 1942. The boundary for the potential extended period of significance to 1975 may vary.



Project Overview

Figure 1

Its period of significance is currently documented as 1884 to 1942, although, the district is currently being evaluated by the MnSHPO and the Minneapolis Park and Recreation Board (MPRB), which is unrelated to the BLRT project, to determine if it possesses significance within the period of 1943 to the mid-1970s, reflecting the significance of improvements developed in accordance with a 1971 plan by Eckbo, Dean, Austin and Williams.

The current boundary of Theodore Wirth Park contains approximately 760 acres (307.6 hectares) of land in the municipalities of Minneapolis and Golden Valley, Hennepin County, Minnesota; however, not all of this area has been determined eligible for the NRHP. The boundaries of Theodore Wirth Park depicted in the draft NRHP nomination for the GRHD are slightly different than the current boundary for the park (Figure 1). The main difference is that the boundary from the draft NRHP nomination excludes a portion of the Par 3 Golf Course and all of the area identified as the "Back 40," both are located on the far western side of the park. There are also slight differences in the eastern boundary along Olson Memorial Highway. To ensure that all possible contributing features are identified, the focus of this study is the entirety of Theodore Wirth Park that is encompassed by both boundaries, the one from the draft NRHP nomination and the current Theodore Wirth Park boundary ("Study Area," see Figure 1).

The presence of LRT infrastructure may alter the characteristics of elements of Theodore Wirth Park by changing the character of the property's use or physical features that contribute to the property and/or its setting, or introducing visual elements that otherwise diminish aspects of its integrity that qualify it for inclusion in the NRHP as a contributing resource to the GRHD. A summary of specific Project elements and potential visual effects is provided in Section 4.0 Viewsheds. Therefore, the focus of this cultural landscape study is to identify features within the APE that may be affected by the BLRT project, both within the current period of significance from the draft NRHP nomination and the potential extension to 1975, to inform the analysis of effects and Section 106 consultation for the BLRT project. This study does not address other MPRB-owned properties or other historic properties that are located outside of the Study Area.

Theodore Wirth Park roughly extends from Interstate-394 on the south to Golden Valley Road on the north; and from France Avenue North and South/Sweeney Lake on the west to Xerxes Avenue North on the east. Theodore Wirth Park and Theodore Wirth Parkway have also been previously recommended as individually eligible for the NRHP under Criteria A, B, and C with a period of significance of 1889 through 1952 (Pearson 2002:7-8, 23). However, MnSHPO has not officially concurred with this finding (Personal Communication, Denis Gardner, National Register Historian, MnSHPO, May 4, 2015). A majority of the resources within Theodore Wirth Park have not been previously evaluated to determine their individual eligibility for listing in the NRHP.

The specific purpose of this cultural landscape study includes the following:

- Provide a historic context for Theodore Wirth Park and document its developmental history to provide an understanding of landscape features of the park (see Section 3).
- Identify viewsheds within Theodore Wirth Park where the BLRT project may be visible, including the four viewsheds specifically identified by the MPRB and MnDOT CRU, and identify

any other viewsheds that may exist through field survey and comparing those areas to the current APE (see Section 4).

- Identify the physical characteristics of the landscape, including a broad overview across the entire park and specific details within the APE and viewsheds, using existing documents and field survey (see Sections 5.1 and 5.2).
- Identify contributing elements to the GRHD within the APE and viewsheds where properties may be affected by the proposed BLRT project (see Section 5.4).

A total of 41 features have been previously documented within the Study Area and the corresponding inventory forms are on file at the MnSHPO. These resources are primarily evaluated within the current period of significance for the GRHD that ends in 1942. Of these 41 total features, 30 are identified in the draft NRHP nomination prepared in 2012 for the district. All 41 features are summarized in Appendix A. Elements such as topography, vegetation, and views and vistas, which are mentioned in the draft NRHP nomination, but do not have separate inventory forms, are also part of the cultural landscape in Theodore Wirth Park and are included in this study. The resources identified in the current draft NRHP nomination for the GRHD, which is the basis for MnSHPO's determination of eligibility, are relied upon as a basis for identifying contributing and non-contributing features within the currently documented period of significance (ending in 1942) for the purposes of Section 106 compliance. Features dating between 1943 and 1975 are further documented by this cultural landscape study since these features have not been formally evaluated by previous studies. The current evaluation of contributing and non-contributing features during this extended timeframe is currently in progress by MPRB and MnSHPO and may not be finished prior to completion of the Section 106 compliance review process for the BLRT project. Thus, this cultural landscape study also identifies features dating within the extended timeframe (1943 to 1975) that appear to be contributing, to better inform the Section 106 compliance review process for the BLRT project. Parisa Ford, M.S., AICP, who meets the *Secretary of the Interior's Professional Qualifications Standards* for Architectural History and History, served as the principal investigator for this study.

2.0 METHODS

The cultural landscape within the Study Area was identified and documented in accordance with guidance published by the National Park Service (NPS) and The Secretary of the Interior. *National Register Bulletin 18: How to Evaluate and Nominate Historic Designed Landscapes*, *National Park Service Cultural Landscapes Inventory Professional Procedures Guide*, and *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Historic Landscapes* were consulted (NPS 1993; NPS 1995; NPS 2000). Landscape features were documented within the historic context of Theodore Wirth Park and the larger GRHD.

The cultural landscape of Theodore Wirth Park within the Study Area was documented through research and fieldwork. Previous studies and inventory forms on file at the MnSHPO were reviewed. Research was conducted using primary and secondary source materials focusing on the original design intent. This research further informed the identification of contributing features to the GRHD. Primary source research was conducted at the Minneapolis Central Library Government Records Collection. Additional plans and studies were obtained from the Minneapolis Park and Recreation Board (MPRB) and Minneapolis Heritage Preservation Commission (HPC).

The following reports provided a framework for developing the historical context of Theodore Wirth Park: *National Register of Historic Places Registration Form: Grand Rounds (draft)* (“draft NRHP nomination”) (Roise, et al. 2012); *Theodore Wirth Parkway and Theodore Wirth Park: An Assessment of Significance* (Pearson 2002); and *Kenilworth Lagoon/Channel Context, History, and Physical Description* (Mathis 2014). The *Theodore Wirth Regional Park Master Plan* (“2015 Master Plan”) was also referenced (MPRB 2015). “Potentially contributing” features identified in the 2015 Master Plan were further assessed through fieldwork and the historical context developed in this study.

The purpose of fieldwork was to examine specific views identified in consultation with MPRB and MnDOT CRU and define viewsheds where the project is visible, and document landscape features within the Study Area and contributing features within the APE and viewsheds. Character-defining features are prominent or distinctive aspects, qualities, or characteristics of a cultural landscape that contribute significantly to its physical character. Land use patterns, vegetation, furnishings, decorative details, and materials may be such features (NPS 1995). Contributing features date from within the period of significance, retain at least fair integrity, and support the areas of significance for which the GRHD is eligible for listing in the NRHP. Character-defining features may be contributing or non-contributing features.

Visibility of the project may change with the season due to the vegetative cover of deciduous plants. Therefore, fieldwork was conducted in mid-April, when no snow was present and prior to full leaf-out of deciduous plants, in an effort to observe potential viewsheds when the lowest level of natural obstructions would exist during the timeframe of this study. During fieldwork, overview photographs were taken to document landscape features throughout the Study Area, visibility to the proposed BLRT project within the Study Area and from other specified vantage points, and contributing features within the APE and viewsheds of the BLRT project. The viewshed analysis identified areas within the Study Area from where

the project would be visible. Typical sections of the project design contained in the Draft Environmental Impact Statement (DEIS) and current project plans were referenced to determine project elements that would be visible within the Study Area (FTA and Hennepin County Regional Railroad Authority 2014). Adjacent utility structures, fencing, and buildings aided in conceptualizing the visibility of project elements.

3.0 CONTEXT AND HISTORY

Theodore Wirth Park contains both native vegetation communities and designed landscapes. The park is a component of the current Grand Rounds system. The comprehensive park system was first conceptualized by H. W. S. Cleveland in 1883. It was referred to as the “Grand Rounds” in a March 14, 1891 letter titled *Report for the Special Committee on Park Enlargement*, which was submitted to the Minneapolis Board of Park Commissioners (MBPC; known as the Minneapolis Park and Recreation Board [MPRB] after 1968) by the Special Committee on Park Enlargement led by William Folwell. The park system was later implemented and expanded under Theodore Wirth during his tenure as Park Superintendent (1906-1942) (Wirth 2002:63,116). The land comprising Theodore Wirth Park was first identified as the “northwest park” in the “Grand Rounds” system described by the Special Committee on Park Enlargement, and later incorporated into the Grand Rounds under Theodore Wirth.

The park includes recreation areas that were shaped by trends in conservation, landscape design, urban planning, and recreation, as well as the individual visions of Theodore Wirth and Eloise Butler, a retired botany teacher who established the Eloise Butler Wildflower Garden. While the designed landscape areas resulted from a series of plans and consultant recommendations, the “natural” areas evolved more independently under the stewardship of Eloise Butler and the MPRB. The MBPC was largely responsible for early acquisition and development within the broader framework of the Minneapolis park system (Roise et al. 2012:7.1). In 1971, the San Francisco landscape architecture and environmental planning firm of Eckbo, Dean, Austin and Williams prepared a comprehensive parkway system plan for the Grand Rounds that included recommendations for Theodore Wirth Park (Eckbo et al. 1971). The implementation of these plans is discussed in Section 3.2.2. Most recently, when the GRHD was designated as the first urban National Scenic Byway by the Federal Highway Administration in 1998, a new layer of signage and other elements were installed (Roise et al. 2012).

3.1 Minneapolis Parks System

Beginning in the mid-1800s, the City of Minneapolis began acquiring park land in a piecemeal fashion based on either donations or solicitations from individual land owners (Wirth 2002:16-18). When the MBPC was established in April of 1883 and granted legislative authority to develop a system of public parks and parkways separate from the City of Minneapolis, it immediately authorized its president to engage Horace William Schaller (H. W. S.) Cleveland as an advisor. Cleveland was a well-known landscape architect who had previously lectured on park development in Minneapolis and St. Paul in 1872, and was developing several plans for St. Paul (Roise et al. 2012:8.1,8.3).

Cleveland delivered his report, *Suggestion for a System of Parks and Parkways for the City of Minneapolis*, to the MBPC in June of 1883 (Wirth 2006:28). He promoted the development of parks as a sound investment from the perspectives of conservation and desirability to future generations. He argued that, “a judicious expenditure for such objects is always a wise and safe investment” (Cleveland 1883:3). His plan suggested a system of interconnected parks and parkways, highlighting the Mississippi River, Lake Calhoun, Lake Harriet, Loring Park, Hawthorn Park, and two other proposed parks. He gave special emphasis to the striking character of the Mississippi River, while also stressing the potential of Minnehaha Falls and Minnehaha Creek as a link back to the Mississippi River. However, the present-day

Theodore Wirth Segment of the Grand Rounds (inclusive of Theodore Wirth Park, Theodore Wirth Parkway, and Valley View/Glenview Terrace Park) was not included Cleveland's plan (Cleveland 1883). Most of the area for this segment was outside of the Minneapolis municipal boundary at that time. Three years after Cleveland's report, Fredrick Law Olmsted, a nationally prominent landscape architect, wrote a letter to the MBPC urging its leadership and forethought in planning park acquisitions (Wirth 2006:34-38).

Cleveland's plan made a strong impression on the MBPC. In 1891, the Special Committee on Park Enlargement issued a letter titled *Report for the Special Committee on Park Enlargement* that contained recommendations for the Minneapolis park system. They refer to Cleveland's concept as an outline of a general plan or scheme of a park system, which was not intended to be carried out with literal exactness. Its true value as a plan was that it would treat parkland as a comprehensive whole, rather than isolated and unrelated fragments. The Special Committee on Park Enlargement argued that "the new park areas, should not be such, in location and extent as property holders may, in view of their private interests, donate or sell to the city..." (Wirth 2006:113). Furthermore, they argued, "to meet the needs and wants of the city, as a whole, there must then be a general plan, organizing a system" (Wirth 2006:113).

The MBPC sought to extend the Minneapolis park system beyond the specific areas Cleveland highlighted. The 1891 letter prepared by the Special Committee on Park Enlargement stated that the parkways, "...shall not be confined to the southwestern quarters of the city, but that they shall be extended to encircle practically all of its quarters" (Wirth 2006:113). They proposed extending the parkway from Kenwood Boulevard to Cedar Lake and north to Glenwood Park (Theodore Wirth Park), where a park not less than 1,500 feet wide would be developed at the northern boundary of the city. Their report concluded by listing seven suggestions for the park system as a whole. The first suggestion was to name the system of parks and parkways "The Grand Rounds." The second suggestion was to develop a "northwest park." The northwest park is at the present-day location of Theodore Wirth Park (Wirth 2006:113-116). The remaining five suggestions pertained to other areas of the park system. Land was first acquired for Theodore Wirth Park (first known as Saratoga Park, and later as Glenwood Park) in 1889 (Roise et al. 2012:7.50).

In addition to Olmsted's and Cleveland's recommendations to the MBPC, Warren Manning submitted a report in 1900 offering recommendations for expanding the system and giving even more focus to the Mississippi River gorge (Wirth 2006:68). However, like Cleveland, neither Olmsted nor Manning offered any specific recommendations for Theodore Wirth Park, for which the first tract of land had already been acquired in 1889. Continued acquisitions through the 1950s and 1960s would then expand Theodore Wirth Park to its current extent.

Theodore Wirth was hired as Park Superintendent in 1906 and served in that capacity until his retirement in 1935. Originally from Switzerland, his career in the United States (U.S.) began in 1888 as a landscape gardener for Central Park in New York under Superintendent Samuel Parsons. He also worked independently on landscaping plans for private estates and cemeteries across New Jersey, Connecticut, along the Hudson River, and on Long Island. As Superintendent of the newly created Hartford, Connecticut, park commission, he carried out plans by Olmsted and Charles Eliot, and designed and

constructed the first municipal rose garden in the U.S. at Elizabeth Park. Charles Loring identified Wirth as part of a search committee to replace Superintendent William Berry upon his retirement in 1905. Shortly after assuming the role of Minneapolis Park Superintendent, Wirth issued his first report, which included a series of recommendations for developing more playground and recreation space, removing fences and unnecessary signage, systematically improving street trees, undertaking special forestry work in the parks, and enlarging the nursery for cultivation of planting materials. He greatly expanded Theodore Wirth Park over several decades, as well as the Minneapolis park system on whole. He extended the parkway system to link Theodore Wirth Park to the Chain of Lakes on the south, and Victory Memorial Park and Parkway on the north. Over his 30-year tenure, the park system grew from 1,800 acres to approximately 5,200 acres. When Wirth retired in 1935, he was given the title Superintendent Emeritus and awarded several medals, and in honor of his accomplishments, Glenwood Park and its features were renamed Theodore Wirth Park in 1938 (Roise et al. 2012:8.4-8.6).

The Grand Rounds is among the earliest interconnected parkway systems in the nation and one of the largest ever constructed. It also responds to the individual characteristics of each segment in the system while maintaining a recognizable consistency. By 1931, much of the park system was in place. Depression-era federal relief programs further improved the parks and parkways, and expanded West River Parkway (Roise et al. 2012:1.4).

The following decades focused on maintenance, improving recreational facilities, and transportation. The prominent landscape architecture and environmental planning firm of Eckbo, Dean, Austin and Williams prepared the last notable plan for the Grand Rounds system in 1971, titled, *Minneapolis Parkway System Concepts for the Future* (Eckbo et al. 1971). Garrett Eckbo formed an initial partnership with his brother-in-law Edward Williams in 1939 that eventually grew to include Francis Dean and Don Austin by 1964. The firm adopted the name “EDAW” by 1973. Their progressive work in landscape architecture quickly gained national and international prominence in sustainable planning at the regional scale (TCLF 2015). The plan that Eckbo, Dean, Austin and Williams prepared for the Grand Rounds sought to unify the system with consistent naming conventions, signage, lighting, and rose-colored pavement. It also sought to reduce transportation conflicts, decrease commuter traffic, and increase recreational use by narrowing roadway widths and installing parking bays. Additionally, the plan introduced separate paved bicycle and pedestrian paths throughout the parkway system (Eckbo et al. 1971). These paths remain in place today and add to the overall usage and enjoyment of the parkways.

The current GRHD is approximately 50 miles long and encircles most of Minneapolis. Portions also extend into the cities of Golden Valley, Robbinsdale, Saint Anthony, and Saint Louis Park. The GRHD contains the following seven segments: Kenwood, Chain of Lakes, Minnehaha, Mississippi River, Northeast, Victory Memorial, and Theodore Wirth. The Theodore Wirth segment includes Theodore Wirth Parkway (HE-MPC-00082), Valley View Park (HE-GVC-00088), and Theodore Wirth Park (HE-GVC-00081). Theodore Wirth Park was established in 1889 when the first tract of land was acquired. Later expansion to the north and construction of a parkway linking the park to the broader system began after Wirth’s hire in 1906. The last major purchase of land for the “Back 40” area, west of Theodore Wirth Golf Course and the Par 3 Golf Course, occurred in 1957, and the final purchase of land north of Glenwood Avenue occurred in 1966 (MPRB 2010:28). Theodore Wirth Park is the largest park in the

Minneapolis park system and the largest single component of the Grand Rounds (Roise et al. 2012:7.50). While the majority of the 760-acre (307.5-hectare) park is located in Golden Valley (563 acres [227.8 hectares] or 74.1%), 197 acres (79.7 hectares) are located in Minneapolis.

3.2 Theodore Wirth (Glenwood) Park Development

3.2.1 DESIGN INTENT

The 1891 letter published in the MBPC annual report, titled *Report for the Special Committee on Park Enlargement*, referred to Theodore Wirth Park as the “northwest park.” The report recommended that the northwest park should be treated as a large park for general purposes and would be accessible to residents of the whole northwestern quarter of the city (Wirth 2002:114). However, at the time of the report, specific plans were not made for the park, nor were improvements made. The present character of the park largely reflects the visions of Theodore Wirth in its designed areas and Eloise Butler in its more natural areas. The 1971 plan by Eckbo, Dean, Austin and Williams reinforced the recreational value of the park, offered solutions to transportation conflicts, and provided guidance for creating a more cohesive parkway system. Theodore Wirth Park (then known as Glenwood Park) (HE-GVC-00081) and Wirth Lake (then known as Glenwood Lake) (HE-GVC-00094) were renamed in honor of Theodore Wirth on September 7, 1938 (Pearson 2008h). The wildflower garden (HE-MPC-05098) was renamed in honor of Eloise Butler on June 19, 1929 (Pearson 2008a).

The original design that Theodore Wirth developed for Theodore Wirth Park in 1914, titled, *General Plan for the Improvement of Glenwood Park*, follows the model of country parks by taking advantage of natural features to create a more pastoral environment within urban areas, an approach that was established by Fredrick Law Olmsted and Calvert Vaux for Central Park in Manhattan and Prospect Park in Brooklyn (Pearson 2002:9). Wirth recognized that the park’s primary value was in its natural character, which reminded him of his Swiss homeland, and he sought to artistically enhance the park through landscape design. Wirth’s upbringing and early career path had a strong influence on his plans for the park. Growing up, Wirth visited horticultural gardens near his home and traveled through the Swiss valleys and hills, where he studied the flowers, trees, rocks, and flowing rivers in the area (Thorpe 2004:8). His career began as a landscape gardener in Switzerland, followed by travels in London and Paris to build on his experience. His early work in the U.S. included gardening and maintenance in Central Park and the implementation of designs by Olmsted and Vaux in Hartford (Roise, et al. 2012:36). While Cleveland advised against large central parks in Minneapolis due to its harsh northern climate and warned that Bassett Creek was a health hazard, Wirth was able to see the value of such a large-scale park and its water features (Cleveland 1883:12-14, Wirth 2006). After first touring the area for Theodore Wirth Park with C. J. Rockwood, Board Attorney, Wirth remarked, “the topographical contour and many natural attractions of those beautiful wooded hills and open country along the western city limits, as well as the possibilities offered for charming water landscape through the Bassett Creek Valley, impressed me as affording splendid opportunity for the development of an extensive natural park” (Wirth 2006:174). In 1914, Wirth developed the first comprehensive plan for the park that included circulation paths, landscaping, recreation, and water features. Over the course of his career, Wirth recognized a growing trend that had begun as early as the 1890s among the public and park authorities to provide more active recreation areas for activities such as boating, bathing, skating, and music, and playgrounds for children (Wirth 2006:67).

Wirth's 1914 plan is described in further detail in Section 3.2.2 Acquisition and Development. Wirth's key design elements for the park included the planting of thousands of evergreen trees and shrubs, the custom-designed Chalet (HE-GVC-00015) based on a model he had seen on his wedding trip to his homeland in 1895, development of the first public golf course, and a series of aesthetic lagoons along Bassett Creek (Pearson 2008h, Pearson 2002:10). Wirth continually advocated for expanding the park acreage, first remarking in 1906 that, "the adjoining land to the east and south is irresistibly attractive with its wooded hills and dells and mall woodland meadows...for all other purposes this land is almost useless, for park purposes it is made to order" (MBPC 1907:43). He also continuously urged the MBPC to acquire sufficient land that would ensure the park would remain an oasis as the city developed. Wirth had also intended for a much larger section of park land to be acquired west of Theodore Wirth Park, as depicted in the map titled, *Location Map Showing Contemplated Acquisitions West of Glenwood Park & Sunset Hill*, and published in the MBPC annual report for 1922. This larger area included Twin and Sweeney lakes and land southwest of Sunset Hill, each comprising approximately 250 acres, that was never fully realized (MBPC 1923:40).

The Eloise Butler Wildflower Garden is a 15-acre nature area located east of Birch Pond and South of Wirth Lake containing a wetlands area, a hardwood forest and an oak savanna (Pearson 2008a). Eloise Butler was a retired botany teacher who served as the wildflower garden's first formal caretaker and advocate. She shared the concerns of other teachers and students about rapidly disappearing natural areas as a result of urban development. Much of her inspiration for the wildflower garden came from Minneapolis area parks, including specifically the quaking bog and prairie areas linking the golf courses in Theodore Wirth Park (FWG 2015). Butler was largely influenced by the Romantic Movement, and the romance of nature studies and botanical education (Neckar 1995:5).

In 1971, the internationally prominent landscape architecture and environmental planning firm Eckbo, Dean, Austin and Williams developed a comprehensive parkway-system plan for the Grand Rounds with recommendations for Theodore Wirth Park. The plan focused on reducing commuter traffic and retaining the recreation use of the parkway system, while also reducing transportation conflicts.

3.2.2 ACQUISITION AND DEVELOPMENT

Theodore Wirth Park was acquired incrementally over 68 years, beginning first with a 64-acre section in 1889 that included Birch Pond, Brownie Lake, and land east of Brownie Lake up to the present-day Xerxes Avenue (MPRB 2015:3.3). The last portion, known as the "Back 40," was located east of Sweeney Lake and acquired in 1957. Since land was acquired in a pattern moving from south to north, and then west, the oldest portions of the park are located south of Highway 55 and were primarily developed by 1940; portions located north of Highway 55 were primarily developed from 1916 through 1962.

The area where Theodore Wirth Park is now located was first surveyed by Jessie Jarrett in 1853, who noted it had numerous streams, marshes, ponds, swamps, and tamarack bogs that he declared "unfit for cultivation" (FWG 2015). It was later purchased by land speculator Samuel Gale in 1883 and sold to Thomas Wilson shortly thereafter (FWG 2015). Adjacent land owners then petitioned the MBPC to acquire the land. While the adjacent land owners offered to help fund the purchase, its price of \$100,000 was ultimately funded through a 10-year assessment plan payable by property taxes. The 64-acre area,

which had been platted as the Saratoga Springs Addition and Lyon's Spring Park Addition, was purchased in 1889 and was the first tract of land comprising the park (Pearson 2002:2).

The Oak Park Improvement Association first requested expanding the park from its initial tract in 1905 to include Wirth Lake (first known as Keegan's Lake and later as Glenwood Lake). However, Wirth's later, more ambitious recommendation to the MBPC was to acquire land all the way to Golden Valley Road. The additional land was acquired in 1907 and 1909, totaling 100 acres. It encompassed Wirth Lake, the former Minneapolis Brewing and Malting Company's beer garden located east of Wirth Lake, and the former Schell Farmstead located northwest of Wirth Lake (Pearson 2002:3). Another major addition in 1917 extended the park along France Ave to 19th Avenue North (Glenwood Avenue), bringing the park's total acreage to 681 (Wirth 2006:174). While neighbors and civic organizations largely supported MBPC's acquisitions, the last portion required condemnation proceedings from two property owners in 1916 (Gardner and Hess, Roise and Company 2000:3). In 1922, Wirth proposed more extensive acquisitions that would include all of Twin and Sweeney Lakes west of Theodore Wirth Golf Course, as well as land southwest of Sunset Hill (located at the intersection of Theodore Wirth Parkway and 26th Avenue North, outside of Theodore Wirth Park), encompassing approximately 500 additional acres combined. However, this was never fully realized. By 1950, only 87 of the 250 acres located west of the park that were originally advocated by Theodore Wirth were still undeveloped and available for park land acquisition (MPRB 2010:27). In 1952, the land around Brownie Lake was sold to Prudential Insurance Company for a regional headquarters and proceeds were used to purchase the "Back 40" area in 1957. The remaining portion of the 250 acres was located north of Theodore Wirth Park, part of which was acquired for Valley View/Glenview Terrace Park and the remainder of which was developed.

The area dedicated to what is now the Eloise Butler Wildflower Garden and Bird Sanctuary was well-known to teachers and students studying nature due to its quality timber and undergrowth. These qualities also made it a wonderful bird sanctuary within the urbanizing city. Eloise Butler became its official steward in 1911. She kept detailed records of the plant species, locations and conditions. In addition to preserving native vegetation onsite, she also imported other species from different areas of the park, throughout the city, and from other states that she thought would grow well in that environment. Therefore, the garden was not managed strictly as a conservation space, but more as a natural garden (Neckar 1995; FWG 2015). Butler served as the garden's curator until her death in 1933. In 1929 the garden was renamed in her honor, and a memorial oak and boulder were placed in the garden commemorating her dedication. The Martha E. Crone Visitor's Shelter was constructed in the middle of the wildflower garden in 1969 (Atwood 2009b). It replaced the original, smaller structure that served as Butler's office (Figure 2) (FWG 2015).



Figure 2. Eloise Butler's original office in the Wildflower Garden (MHS 1915)

While Butler found inspiration in the bog's plants, the area comprising the Quaking Bog did not receive much attention historically in planning, recreation, or maintenance by the MBPC. It has been noted as the site of a former Tuberculosis (TB) Camp for children, although no remains have been documented (MPRB 2014:5.5, 5.10). After becoming overgrown with buckthorn and purple loosestrife, the MPRB began efforts to restore the area in the 1980s by clearing out undergrowth, removing invasive species, replanting tamarack trees, and constructing a boardwalk (Pearson 2008o). This type of vegetation management to reduce invasive species and protect natives and cultural plantings continues (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

Wirth's early development of Theodore Wirth Park focused on plantings, topography, and parkways to enhance its alpine character. Between 1908 and 1935, Wirth's recorded plantings included 25,488 evergreens, 5,266 shrubs, and 1,016 deciduous trees. The varieties of evergreens included Norway spruce, white pine, bull pine, pitch pine, jack pine, balsam fir, cedar, eastern hemlock, juniper, yew, Black Hills spruce, and arborvitae (Pearson 2002:10). Many were cultivated in the park nursery, which was located South of Highway 55 and west of Wirth Lake at the site of the former Keegan-Schell Farmstead between 1909 and 1980 (MPRB 2015:5.9). Wirth intended these plantings to overcome what he considered a "lack of coniferous growth" and to provide year-round greenery and conceal the edges of the park (Pearson 2002:10). In 1908 he stated, "It is my aim to plant evergreens freely in most of our parks and especially throughout woodlands and along our picturesque driveways. It is to be regretted that so few evergreens have been planted in the past, for while the climate may be limited, those that are hardy produce splendid specimens within reasonable time" (MBPC 1909:47). His growing affinity for evergreen plants was evident throughout annual reports between the early 1900s and early 1940s. At one point Wirth remarked: "The introduction of evergreen foliage amongst the deciduous will greatly enhance the general aspect of our natural woodland scenes, and enliven them in the winter. It is impossible to do too much of such a planting" (MBPC 1921:57).

Historic evergreen plantings along the parkway and around the Chalet are signature features of Wirth's design intent for the park. To a lesser extent, evergreen plantings along the park edges are indicative of Wirth's plans to conceal the edges of Theodore Wirth Park. The nursery, which supplied much of the plant material for the park, was relocated to the former Keegan/Schell Farmstead in 1910 (Pearson 2002:2-3, 14). The nursery also supplied plant material for the larger Minneapolis park system and streets. At times surplus material was also sold to private customers. However, by 1948 Wirth recommended that a new location be identified in the near future since so much of the soil and nutrients had been stripped from its intensive use over time (Wirth 2006:207).

In addition to expanding park acreage, Wirth consistently sought ways to extend access into the park and link it to the larger Grand Rounds system. Wirth first began making his case in 1907 (MBPC 1908:11). In 1909, he began focusing on streetcar line extensions to bring more people into the park. When the streetcar line was finally extended into the park in 1916, Wirth remarked that it "advanced greatly the usefulness and popularity of our largest park." He credited the streetcar line for bringing more visitors to the park and especially to the beach and picnic area (Atwood 2010).

Theodore Wirth Parkway was constructed between 1911 and 1915 to link the park to the Grand Rounds system. It was designed as a curving pleasure drive following the natural contours of the land (Pearson 2002:12). Scenery along the drive was meant to be enjoyed while in transit. The route in its entirety is depicted in Theodore Wirth's 1914 plan titled, *General Plan for the Improvement of Glenwood Park*. The western extension of Plymouth Avenue into the park became another important opportunity to expand access to the park and link it to the Grand Rounds system. Wirth first introduced this opportunity in his 1914 plan for the park (MBPC 1914:94a). In 1916, he states an entrance at Plymouth Avenue must be provided and that its setting will allow for "...a picturesque entrance, which may well be considered a part of the 'Grand Rounds.'" (MBPC 1917:40)

In 1914, Wirth developed his *General Plan for the Improvement of Glenwood Park* as an elaborate plan for the park's design and use (Figure 3). It also provided the first comprehensive program for the park, including roadways, paths, lagoons (HE-GVC-00089), a golf course (HE-GVC-00097), playgrounds, and tree-lined boulevards around the park perimeter (note the extension of Plymouth Avenue shown at the center). While the plan sought to preserve the wildflower garden, it recommended replacing the Quaking Bog with a camp and playground to attract more visitors. The camp grounds were extensive, reaching from the Osseo Branch Line ROW to Birch Pond. However, these improvements were never made (Pearson 2008o).

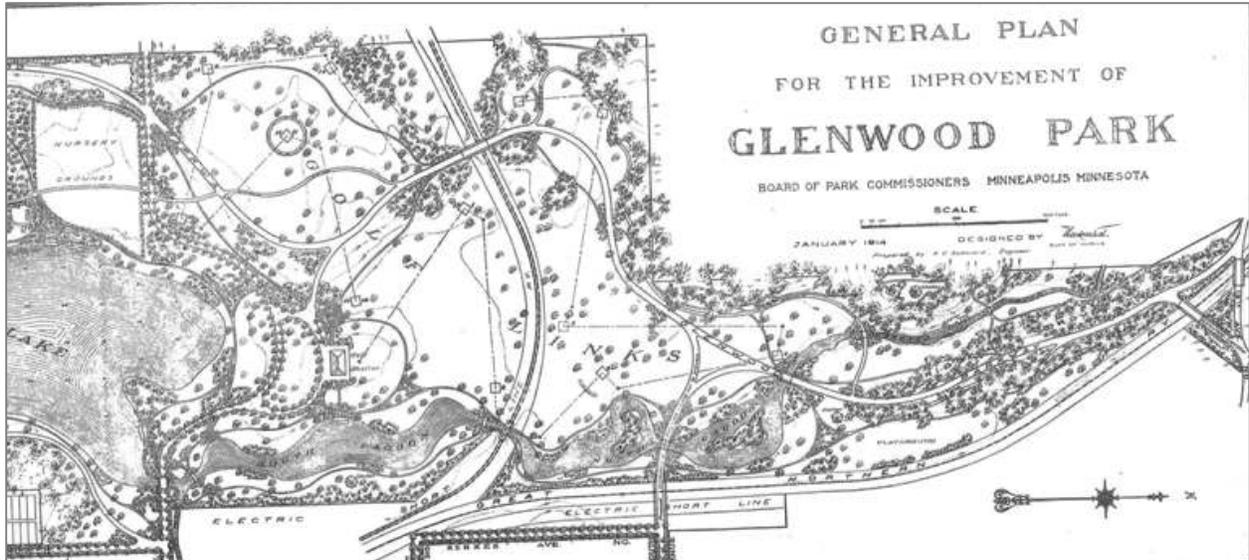


Figure 3. General Plan for the Improvement of Glenwood Park (northern section only shown here) (1914) (MBPC 1914:94a).

After World War I, Minneapolis residents had an increased interest in golf and Wirth developed the first public golf course in the city at Theodore Wirth Park and it quickly gained popularity. Wirth's original plans for the golf course called for 16.7 miles of walks to reach all areas of the park and the development of lagoons as an aesthetic enhancement (Pearson 2008g). The original nine-hole course was constructed in 1916 and later expanded to 18 holes in 1919. Both the original and expanded courses were designed by golf course architect William D. Clark (Pearson 2008h). Wirth's 1918 plan titled, *Proposed Extension of Municipal Golf Course* (Figure 4) shows the course extending fully north to 19th Avenue North (Golden Valley Road) (MBPC 1918:38a). The Chalet is shown its current location, set into a "woodland" area at the foot of the hill, although it would not be constructed until 1922. The lagoons first represented in this plan underwent several iterations until they were finally implemented through federal relief programs in 1933 under the Civil Works Association (CWA), then in the late 1930s under the Works Progress Administration (WPA) (Wirth 2002:105). As early as 1913, Wirth began promoting lagoons for rowboat and canoe use (MBPC 1914:94). Several years later he argued that attractive and navigable lagoons would make the swamp land available for useful purposes and enhance the park's scenic effects without destroying its natural character (MBPC 1916:40).

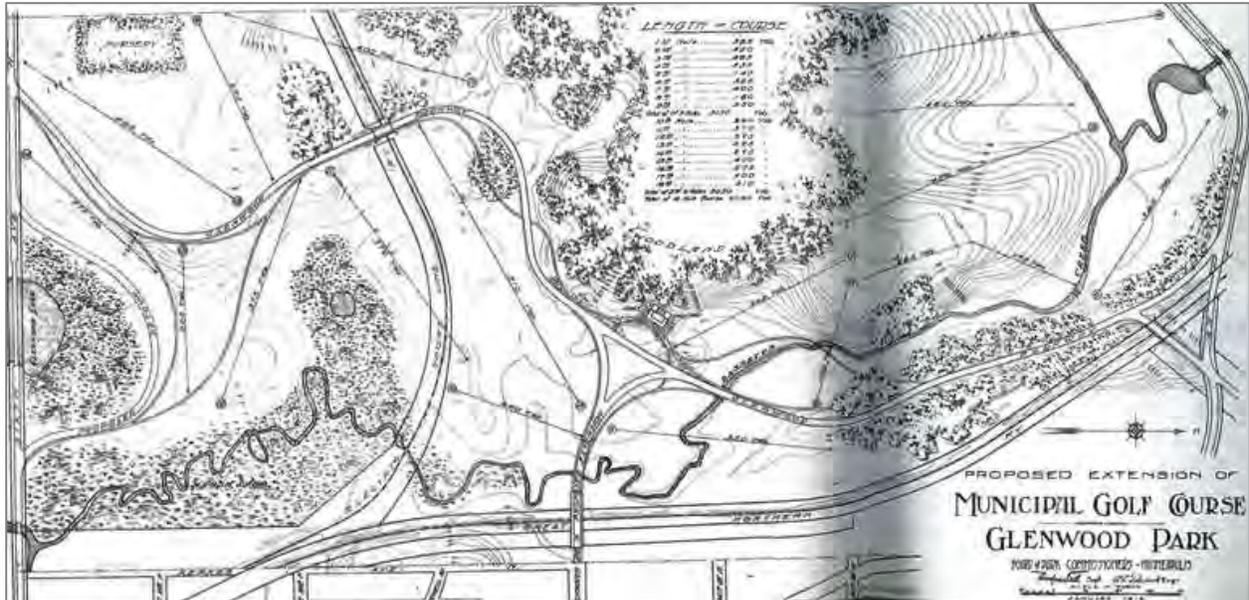


Figure 4. Proposed Extension of Municipal Golf Course (MBPC 1918:38a).

The golf course became increasingly popular, necessitating the introduction of user fees to manage access and maintenance of the course. While only a modest few cents were charged per player, these fees supported the construction of an impressive chalet-style clubhouse (built in two phases in 1922 and in 1923), and fully funded maintenance and staffing needs by 1925 (Pearson 2008h). The Chalet was designed by architects Magney and Tusler and modeled after a building Wirth had seen on his honeymoon in Switzerland (Figures 5 and 6) (MPRB 2010:18). Later, the 1930 Tool Building (HE-GVC-00086) and the 1940 Bridge L9327 (HE-GVC-00050) were designed to reflect the style of the Chalet (Pearson 2008b, Pearson 2008h). After the final western tract of land was acquired in 1957, the Par 3 Golf Course and Par 3 Golf Course Clubhouse (HE-GVC-00087 and HE-GVC-00085, respectively) were constructed in the early 1960s (Pearson 2008i; MPRB 2010:27).



Figure 5. *Glenwood Golf House Perspective* by Magney & Tusler, showing the second concept design as it exists today. Note the lower vegetation density and absence of evergreen plantings (MBPC 1921:72).



Figure 6. *Chalet building and its landscaping*. Note the introduction of evergreen plantings (MHS 1936).

Throughout the park's history, the hills on the west and north sides of the golf course were used for winter recreation. Ski jumping reached its height in popularity roughly between 1910 and the 1920s when Olympic ski trials were held in the park (Figure 7). The sport continued into the 1980s, but the jumps were removed around 1986 after they fell into poor condition (MPRB 2010:18). Other popular winter activities included tobogganing and sledding.

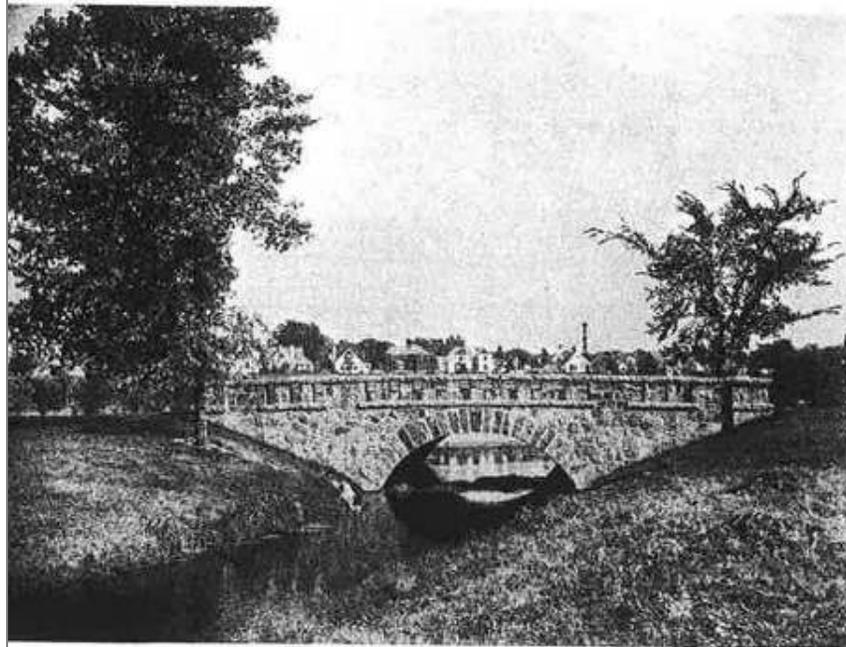


Figure 7. Ski jump on the western slopes of the golf course (MHS 1923).

During the Great Depression, federal relief programs operated in Theodore Wirth Park. Camps were set up for workers at the western edge of the park, northwest of the Chalet and maintenance buildings. They were used year-round by the CWA, and later by the Civilian Conservation Corps (CCC) and WPA. Afterwards, youth camps used the camps until they were dismantled in the 1950s (MPRB 2010:21). These federal relief programs were responsible for the construction of the lagoons, additional lake dredging, benches and picnic areas, and the construction of Bridge No. L9327 over Bassett Creek (Figure 8). The CWA and CCC began work at the lagoons, which the WPA later completed (Figures 9 and 10). Overall, the WPA had the most extensive work orders and longest-term assignment at the park. The WPA resurfaced the Wirth Lake Beach shoreline and rebuilt the golf course. Between 1937 and 1939, the WPA also installed screens on the Picnic Pavilion (HE-GVC-00083), which was originally constructed by the MBPC in 1930, and constructed concrete picnic tables throughout the area. WPA crews also installed cobblestone riprap along Bassett Creek to prevent shoreline erosion (MPRB 2010:22). The WPA's 1941 annual report notes the construction of other small-scale features, including a cobblestone-backed drinking pump and a semi-circular stone wall surrounding the spring at Glenwood Avenue and Theodore Wirth Parkway (also known as Great Medicine Spring) (MPRB 2010:23-25).



Old Bridge.



Pictures by Walter Dahlberg
A New Substantial Bridge of Seam-faced St. Cloud Granite Replaces the Old Bridge Over Bassett's Creek in Theodore Wirth Park.

Figure 8. Before-and-After comparison of Bridge L9327 (MBPC 1940:61).



Figure 9. Federal relief workers placing riprap along Bassett Creek (MBPC 1941:33).

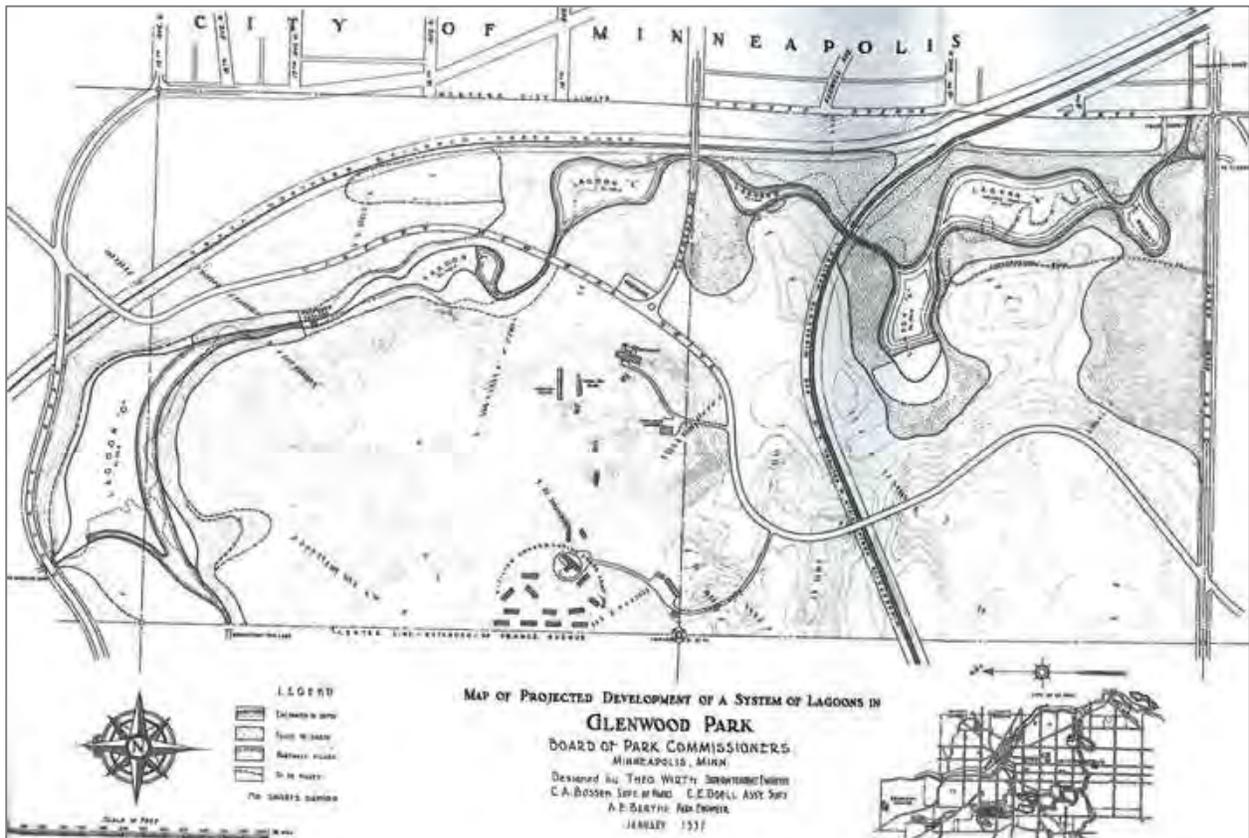


Figure 10. Map of Projected Development of a System of Lagoons in Glenwood Park, as implemented by the CWA, CCC, and WPA (MBPC 1936:110a).

In 1941, a study was conducted identifying Wirth Lake as the most suitable location for Minneapolis' Aquatennial celebration. A 6,000-seat grandstand, diving platforms, and formal, Olympic-sized pool were constructed for these celebrations and remained in place until the late 1960s (MPRB 2010:25-26). However, Wirth considered these structures obtrusive to park scenery. Historical postcards and photographs document a wall of evergreens added as a backdrop to the stage, which likely helped to soften the imposing facility (Figure 11). The MBPC accepted ownership of the facility in 1949. Wirth Lake was the site of the Aqua Follies celebrations from 1941 to 1964. After Aquatennial President Everett Taft declared in 1968 that, "the stadium had long outlived its usefulness as a staging location for summertime entertainment," it was demolished and set on fire as a training exercise by Civil Defense workers (Pearson 2008).



Figure 11. Aqua Follies site at Wirth Lake with evergreen tree enhancements (MHS ca. 1940).

When Robert Ruhe became superintendent in 1966 he was very concerned about the parkways being used as commuter routes and commissioned a study by Eckbo, Dean, Austin and Williams (Pearson 2010:188). Their recommendations were laid out in the 1971 plan titled, *Minneapolis Parkway System Concepts for the Future* ("Eckbo Plan"). The plan focused on circulation and signage to reinforce the cohesiveness of the parkway system as a whole, and enhance its recreational value. The plan states its purpose as a guide for responding to future conflicts, rather than advocating for specific design styles or forms (Eckbo et al. 1971:1.02). It includes more specific recommendations for circulation patterns (i.e., roads, paths, and parking), and broader concepts for signage and lighting. One notable recommendation was the creation of a "Bicycle Grand Rounds" providing for a designated bicycle path routed around all of the lakes, including Wirth Lake, and adjacent to roadways connecting the lakes (Eckbo et al. 1971:4.22). Grade-separated crossings were also shown in plans for Theodore Wirth Park, including footbridges over the parkway and underpasses for pedestrian and bicycle paths (Figures 12 and 13).

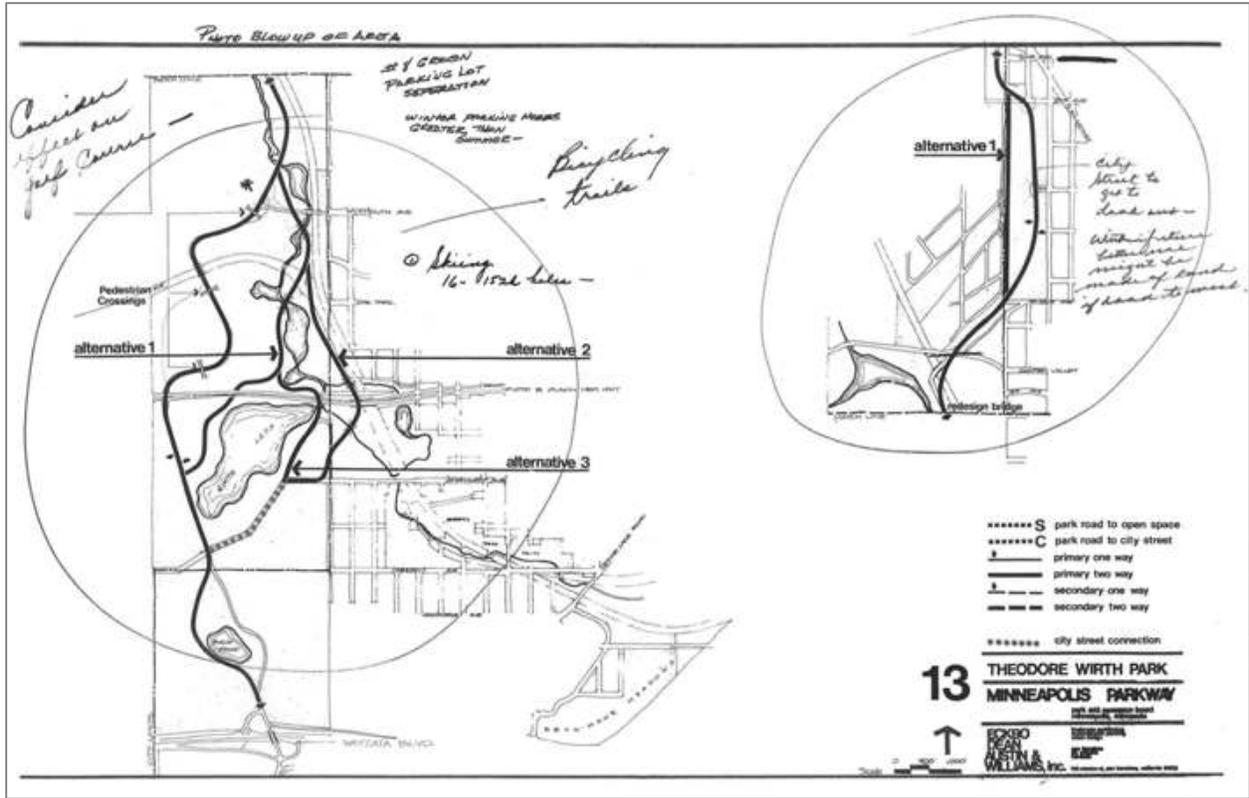


Figure 12. Theodore Wirth Park plan prepared by Eckbo, Dean, Austin and Williams (Eckbo et al. 1971:3.3-3.4).

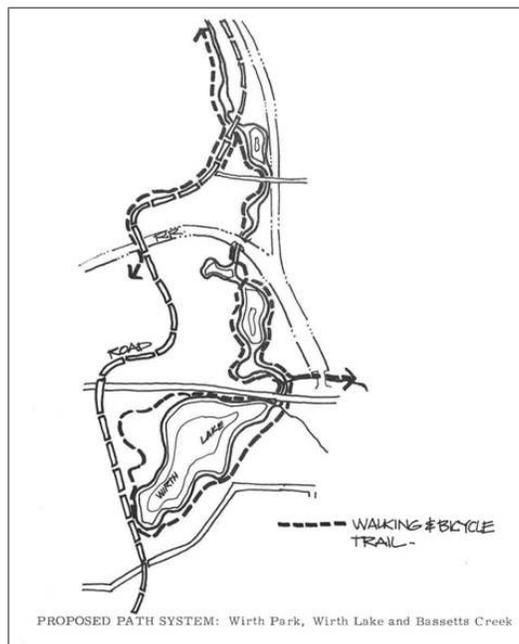


Figure 13. Proposed Path System: Wirth Park, Wirth Lake and Bassett Creek (Eckbo et al. 1971:3.76).

Beginning in 1972, the Citizen's Parkway Committee worked with the local landscape architecture firm InterDesign and engineers at BRW to implement the Eckbo Plan. As a result, Theodore Wirth Parkway

was narrowed from 32 feet to 24 feet, parking bays were installed in 1973, and separated paved bicycle and pedestrian paths were installed along the parkway in the 1970s (Roise, et al. 2012:7.53, Pearson 2002:22). Rose-chip sealed pavement was also introduced throughout the Grand Rounds to bring consistency to the parkway system. Naming conventions helped create unity by replacing all of the existing street suffixes with the term “parkway.”

Also as part of the implementation of the Eckbo Plan a series of other small-scale elements were introduced to Theodore Wirth Park and the Grand Rounds including: dark rectangular wood bollards with chains to guide traffic; low rustic wood signage; lighting; and new picnic tables and benches (Pearson 2008d; Pearson 2002; Roise, et al. 2012). While these elements were not specified in the Eckbo Plan as a concept or design typology given the broader nature of the plan, they represent the more detailed level of design that was done to implement the overall intent of the Eckbo Plan. Uniform types of wood railings and bollard-and-chain railings were developed by InterDesign in the 1970s (Roise et al. 2012:7.9). The signage package was designed by prominent graphic designer and founder of InterDesign Peter Seitz, and introduced to the Grand Rounds in the early 1970s (Mathis 2014:68). Cube-style lighting was also introduced throughout the Grand Rounds to bring consistency to the parkway system; cross-armed light standards were installed at intersections. These lights were designed by Alfred French of InterDesign and featured a slender, approximately 10-foot tall standard with a transparent cube. The new light standards were installed along Theodore Wirth Parkway in 1972 (Pearson 2002:17). New picnic tables composed of wood planks and metal support posts were also introduced to Theodore Wirth Park in the 1970s (Pearson 2002:16). However, this picnic table style is not consistent with the aesthetic of other furnishings developed by InterDesign. By 1970, a play area and extensive landscaping were added to Wirth Lake Beach (MPRB 2010:30-31). Exact installation dates for all features were not indicated in the research completed for this cultural landscape study.

Following the 1971 Eckbo Plan, a *Long Range Improvement Plan* was completed for Theodore Wirth Park in 1980 (MPRB 1980). The goal of the plan was stated as follows, “The thrust of long-range planning for Wirth Park is thus to improve environmental conditions, identify and provide access to resources, and develop continuity between a variety of recreational experiences and locations. Use of the park should fan out from the beach/picnic area to the walks and natural observation areas in all directions, continuing across Highway 55 in an undisturbed manner” (MPRB 2010:8). The 1980 *Long Range Improvement Plan* was a basis for developing the most current plan for Theodore Wirth Park, titled *Theodore Wirth Regional Park Master Plan* (“2015 Master Plan”).

As indicated by the report prepared by MPRB, titled, *Analysis and Historical Review Wirth Lake Area Plan 2010*, more contemporary development of Theodore Wirth Park from the 1980s forward focused on adding more trails, paths, and active recreation opportunities, and on ecological restoration of prairie and bog communities (MPRB 2010). Sand volleyball courts were added west of the beach house by 1997. The beach house was reconstructed in 2005 and a curved wall near the beach was added (MPRB2010:30). A new play area was constructed north of the Wirth Lake Beach House in 2010 (MPRB 2010:30-31) and other notable site and parking improvements were completed in 2012, including the construction of three pergolas and two boardwalks, completing a full walking trail around Wirth Lake. Also, the Luce Line Regional Trail was constructed through Theodore Wirth Park in the 1990s. In 1976, the State of

Minnesota acquired 63 miles of the Electric Short Line Railway "Luce Line"/Union Pacific Golden Valley (UPGV) Railroad ("Luce Line") railroad ROW between Plymouth and Cosmos, Minnesota, removed the railroad ties and tracks, and established the Luce Line Regional Trail. This trail today extends nearly to Hutchinson (Wiltberger et al. 2003; Luce Line Trail 2012). The 10 miles of the Luce Line between Plymouth and downtown Minneapolis remains an active rail corridor today (HE-GVC-055 [Golden Valley Segment], HE-MPC-9800 [Minneapolis Segment]; not previously evaluated as a contributing or non-contributing resource to the GRHD; not eligible for NRHP listing); the Luce Line Regional Trail extends from Plymouth into Minneapolis through Theodore Wirth Park on a paved path that somewhat parallels the active rail corridor. The trail through Theodore Wirth Park was constructed in two phases: first, east of and including segments of the parkway in the 1990s; and second, through the Back 40 connecting the parkway to Ottawa Ave North west of Theodore Wirth Parkway (MPRB 2010:29; Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

Restoration of the Quaking Bog and prairies began in the 1980s and was completed by 1995. After the park was designated as a National Scenic Byway in 1998, additional signage was added in 1999 to unify and call attention to the parkway system. This program introduced a new design vocabulary, including horizontal wood signs that identify parks, parkways, and various park elements; four-sided, pyramidal hip-roofed, wood-frame information kiosks; and painted, metal directional signposts at major intersections (Roise et al. 2012:7.11). The new signage system was installed throughout the Minneapolis park system, in addition to the Grand Rounds, and replaced earlier 1970s-era signage, though some of that remains in the park (Roise et al. 2012:7.11, Mathis 2014:68; Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

3.3 Historical Significance

Theodore Wirth Park is a contributing element to the previously determined eligible GRHD that is currently being nominated to the NRHP. The documented period of significance for the Grand Rounds is 1884 to 1942 (Roise et al. 2012:1.4-1.5). Improvements made in accordance with plans by Eckbo, Dean, Austin and Williams in the early 1970s are currently being evaluated to determine if they possess exceptional significance under National Register criteria, which would possibly extend the period of significance to the mid-1970s. The draft NRHP nomination identifies the significance of the GRHD under Criterion A, in the areas of Community Planning and Development and Entertainment/Recreation as a nationally significant example of urban park development in the nineteenth- and twentieth-centuries; and under Criterion C, in the area of Landscape Architecture as the most comprehensive design by, and crowning achievement of, nationally prominent landscape architect Horace William Shaler Cleveland (1814-1900) and as the most important work by nationally prominent landscape architect and park professional Theodore Wirth (1863-1949).

Additionally, *Theodore Wirth Parkway and Theodore Wirth Park: An Assessment of Significance*, recommends the park and parkway as individually eligible for the NRHP under Criterion A, for their influence on the development of the city of Minneapolis; Criterion B, as an important product of a locally significant individual, William Berry, and a nationally significant individual, Theodore Wirth; and Criterion C, as an example of early 20th century parkway design and as a reflection of a significant trend in landscape architecture, namely the evolution of the country park in an urban environment and the use

of aggressive park planning to anticipate the needs of the city, the concept for which was first developed by nationally prominent landscape architect H. W. S. Cleveland, and further expanded and extended by Wirth; and as a representation of key periods in the evolution of American landscape architecture (Pearson 2002:7-8). The period of significance for the park and parkway is recommended as 1889 through 1952 (Pearson 2002:8). This previous assessment also found that these resources maintain their historic integrity (Pearson 2002:23). However, the MnSHPO has not officially concurred with these findings (Personal Communication, Denis Gardner, National Register Historian, MnSHPO, May 4, 2015). A majority of the resources within Theodore Wirth Park have not been previously evaluated to determine their individual eligibility for listing in the NRHP.

For the purposes of this study, the Study Area includes Theodore Wirth Park and the resources within it that are contributing elements to the GRHD, which is eligible under Criterion A in the areas of Community Planning and Development and Entertainment/Recreation, and under Criterion C in the area of Landscape Architecture. While the period of significance for the GRHD is 1884 to 1942, this study reflects the current evaluation that considers expanding the period of significance to 1975, to account for improvements made in accordance with the Eckbo Plan. Although the individual eligibility for Theodore Wirth Park has not been concurred with by the MnSHPO, resources examined as part of the individual eligibility evaluation of the park are included in this study to identify if they are contributing to the GRHD.

4.0 VIEWSHED ANALYSIS

A viewshed analysis was conducted to identify areas within the Study Area, focused on Theodore Wirth Park, where the proposed BLRT project is visible and may have the potential to cause visual impacts. The presence of LRT infrastructure may alter the characteristics of a historic property by changing the character of the property's use or physical features that contribute to the property and/or its setting, or by introducing visual elements that otherwise diminish aspects of its integrity that qualify it for inclusion in the NRHP. The BLRT alignment will be located on the east side of Theodore Wirth Park, within the existing ROW of the Osseo Branch Line, and will include project elements such as overhead catenary wires, support poles, lighting, and stations, including vertical circulation structures at Golden Valley Road and Plymouth Avenue. The current Golden Valley Road Bridge would be modified to accommodate the BLRT stations. The Plymouth Avenue Bridge would be replaced. A park and ride lot may also be constructed at Golden Valley Road. Additionally, a bridge would need to be replaced at Highway 55 to accommodate the BLRT's transition from Theodore Wirth Park to Highway 55. Freight tracks will be shifted west and an access road will be added. Vegetation in the corridor will be removed and a segment of the creek will be relocated. Furthermore, potential floodplain mitigation may also be required in the vicinity of the park. These project elements may directly alter or be visible from Theodore Wirth Park. Furthermore, there may be additional project elements yet to be determined that may also affect Theodore Wirth Park and/or its setting.

Current project plans and typical sections of the project from the *Bottineau Transit Line Draft Environmental Impact Statement* were referenced for a basic understanding of the project elements to inform the analysis of potential viewsheds within the Study Area (FTA and Hennepin County Regional Railroad Authority 2014). Adjacent utility structures, fencing, and buildings aided in conceptualizing the visibility of project elements.

Areas of visibility to the proposed BLRT project from within the Study Area were documented as part of this analysis. Visibility of the project may change with the season due to the vegetative cover of deciduous plants and trees. Therefore, field survey was conducted on April 15 and April 20, when no snow was present and prior to full leaf-out of deciduous species, in an effort to observe potential viewsheds when the lowest level of natural obstructions would exist during the timeframe of this study. Viewsheds of the project are described according to the relative presence of any obstructions (natural or built) that may exist within the line of sight to the project and the overall range of visibility that may be available (as defined by the cardinal [north, east, south, west] and intercardinal [northeast, southeast, southwest, and northwest] directions) where a direct line of sight to the project may exist. Table 1 defines the terms used to describe visibility according to the relative levels of obstructions present.

Table 1. Terms Used to Describe Visibility

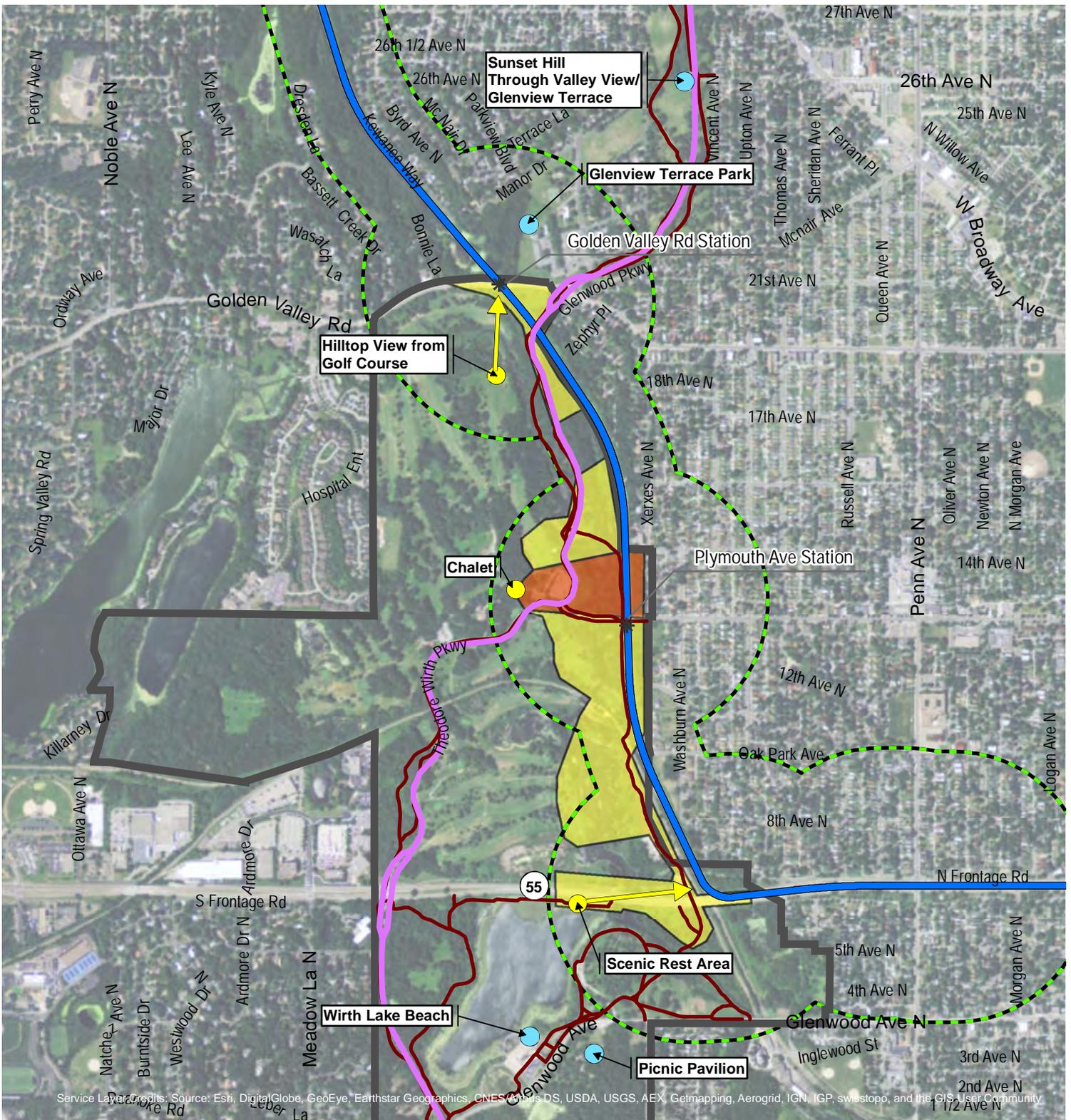
Term	Definition
High / Highly	Little to no obstructions (covering less than 50 percent of the cone of vision) exists while facing any given direction.
Fair / Fairly	Partial obstructions (covering approximately 50 percent of the cone of vision) exist while facing any given direction.
Limited	Obstructions covering more than 50 percent of the cone of vision exist while facing any given direction.

The MPRB and MnDOT CRU identified the following specific vantage points for assessment at the start of the study (Figures 14A and 14B):

- Sunset Hill through Valley View/Glenview Terrace Park
- Valley View/Glenview Terrace Park
- Along Theodore Wirth Parkway
- Theodore Wirth Chalet & Clubhouse

Several additional vantage points outside of the APE were also examined, including Wirth Lake Beach, the Picnic Pavilion, hilltop locations within the golf course, and a scenic rest spot on Wirth Lake (see Figure 14A). These locations include areas of higher elevation and other areas with more expansive, but more distant views that have the potential to include views to the project. However, during fieldwork it was determined that the Wirth Lake Beach and the Picnic Pavilion vantage points had no visibility to the BLRT project due to distance from the project and intervening vegetation. Fair visibility was found to exist from one hilltop location on the golf course, while high visibility of the project was found from the scenic rest spot on Wirth Lake. The regional trail that parallels the Osseo Branch Line, where the proposed BLRT project alignment would be located, was also documented as part of this analysis and found to have high visibility to the project with little to no obstructions along the trail. The location of this trail, which is within the existing APE, is shown on Figure 14A.

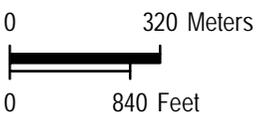
Figure 14A identifies the viewsheds and vantage points that were examined, and depicts the viewshed areas – the broad areas within the Study Area from where the project will be visible. Orange shading indicates the full viewshed of the project from the Chalet, and yellow shading indicates all other areas with project visibility. Figure 14B provides a key to the photograph locations and directions included as Figures 15-24, depicting visibility within the Theodore Wirth Parkway viewshed and the Theodore Wirth Chalet & Clubhouse viewshed. A limited portion of the Theodore Wirth Golf Course (approximately 5.5 acres) outside of the current APE was found to have visibility to the project and is included in the yellow shaded area (Figure 14A). FTA/MnDOT CRU will need to determine if the APE should be revised to include this area. Vantage points represent specific locations that were examined to determine if they have views to the project. Light blue dots indicate where a vantage point was examined and no views to the project exist; yellow dots indicate where a vantage point was tested and views to the project do exist.



Source: MNDOT; City of Minneapolis; 106 Group

Map Produced by 106 Group 8/26/2015

**Blue Line Extension LRT (BLRT)
Theodore Wirth Regional Park
Cultural Landscape Study
Minneapolis and Golden Valley, Minnesota**



1:16,000

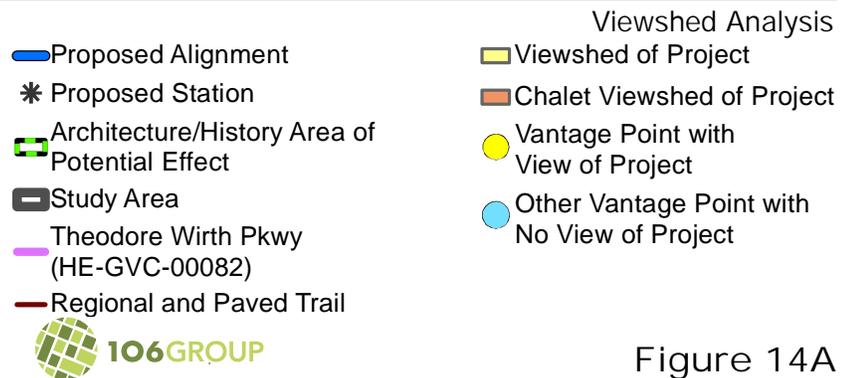
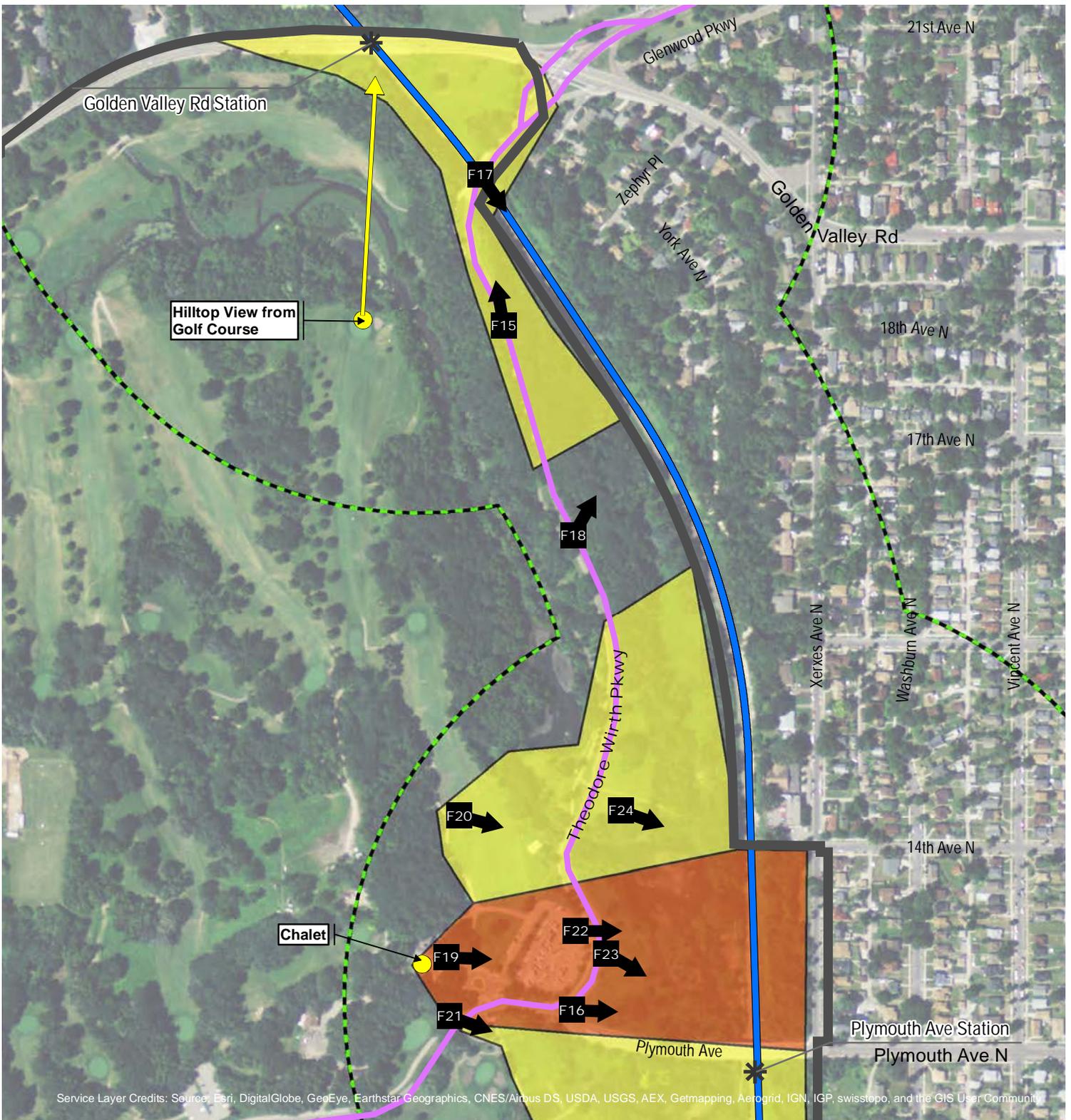


Figure 14A



Source: MnDOT; 106 Group

Map Produced by 106 Group 8/26/2015

**Blue Line Extension LRT (BLRT)
Theodore Wirth Regional Park
Cultural Landscape Study
Minneapolis and Golden Valley, Minnesota**

Theodore Wirth Parkway & Chalet Viewshed Photograph Locations

- Proposed Alignment
- ✱ Proposed Station
- Architecture/History Area of Potential Effect
- Study Area
- Theodore Wirth Pkwy (HE-GVC-00082)
- Viewshed of Project
- Chalet Viewshed of Project
- Vantage Point with View of Project
- ↑ Photograph Location/Direction (Label refers to figure in report)

0 100 Meters
0 280 Feet
1:5,318



Figure 14B

Overall, visibility to the project is significantly influenced by topography and vegetation density. Vegetation density varies by season according to the degree of leaf-out on deciduous plants. However, the density of branches, particularly among understory brush in the wooded areas, as well as the density of evergreen vegetation, still has potential to obstruct views to the BLRT project throughout the full calendar year. Each of the vantage points examined and viewsheds of the project identified is discussed further below.

4.1 Viewsheds to Proposed BLRT Project

The project will be visible from most of the segment of Theodore Wirth Parkway between Golden Valley Road and Plymouth Avenue, with the exception of a limited area (roughly between 16th Avenue North and 17th Avenue North) where vegetation is dense and the existing track is located at a lower elevation than the parkway. The project will be highly visible from the Chalet and its northern hillside, from Bridge L9327, and the picnic and archery areas east of the Chalet. For the most part, the project will not be visible from the golf course areas north of 14th Avenue due to topography and vegetation density. Only one hilltop location in the Theodore Wirth Golf Course has a view of the proposed Golden Valley Road station where vegetation is sparse. From Plymouth Avenue south to the Luce Line tracks, the project has fair visibility with only partial obstructions along the east side of the golf course. The adjacent regional trail located east of Bassett Creek has high visibility to the project with little to no obstruction (see Figure 14A illustrating the location of this trail within the yellow shading areas where viewsheds to the proposed BLRT project exist). The vicinity of the project where Highway 55 crosses Bassett Creek is highly visible from a scenic rest area on Wirth Lake; however, it is not visible from Picnic Ground No. 4 due to the dense vegetation and rolling hills in that area.

Two other defined views to the project were identified during survey work that fall outside of the other viewsheds identified: a hilltop location on the golf course (looking north) and a scenic rest area along the boardwalk at Wirth Lake (looking east).

4.1.1 THEODORE WIRTH PARKWAY VIEWSHED

The project will be fairly visible (see Table 1 for definitions; see Figures 14A and 14B), with only partial obstructions, along most of the parkway north of 14th Avenue North and south of Bridge 27678, which carries Theodore Wirth Parkway over the Osseo Branch Line tracks (Figure 15). Historically-significant, design-intended views of the park exist along this portion of the Theodore Wirth Parkway viewshed at the southbound entrance to Theodore Wirth Park after crossing Bridge 27678. The design intent and significance of this historic view is discussed further under Section 5.2.5 Views/Vistas in the APE and Viewsheds. This portion of the Theodore Wirth Parkway Viewshed has direct visibility facing east towards the proposed alignment. The project will be highly visible with little to no obstruction and a 180-degree range at Bridge 27678 (Figure 16). The project will also be highly visible with little to no obstruction in the vicinity of the Chalet and intersection with Plymouth Avenue (Figure 17). This area has direct visibility within a roughly 90-degree range facing northeast, east, and southeast. A limited area of no visibility exists where vegetation is most dense and the track is at a lower elevation than the roadway (Figure 18). This area is located roughly between 16th Avenue North and 17th Avenue North.



Figure 15. Theodore Wirth Parkway, near Zephyr Place, facing north (project visibility highlighted).



Figure 16. Theodore Wirth Parkway south of Golden Valley Road, over the Osseo Branch Line tracks (Bridge 27678), facing southeast. Existing track and utility infrastructure dominant the current view.



Figure 17. Intersection of Theodore Wirth Parkway and Plymouth Avenue, facing east.



Figure 18. Lack of visibility along Theodore Wirth Parkway, between 16th Avenue North and 17th Avenue North, facing northeast.

4.1.2 THEODORE WIRTH CHALET & CLUBHOUSE VIEWSHED

The Chalet (also currently known as the Theodore Wirth Chalet & Clubhouse), as well as adjacent areas around the building including the patio and nearby benches (orange shading in Figure 14A), have high visibility (see Table 1 for definitions; see Figures 14A and 14B) to the project with few obstructions and a roughly 90-degree range facing northeast, east and southeast (Figure 19). The tracks and Bridge 6247 at Plymouth Avenue are also highly visible from the winter recreation hillside north of the building, facing east and southeast (Figure 20), from the footbridge over the parkway facing northeast and southeast (but not east due to vegetation) (Figure 21), and from the parking lot in front of the Chalet and adjacent picnic and archery areas at roughly a 90-degree range facing northeast, east, and southeast (Figures 22-24).



Figure 19. View from Chalet patio, facing east (project visibility highlighted).



Figure 20. View from winter recreation area, facing southeast (project visibility highlighted).



Figure 21. View from footbridge at Chalet, facing southeast (project visibility highlighted).



Figure 22. View from parking lot, facing east (project visibility highlighted).



Figure 23. View from archery range, facing southeast (project visibility highlighted).



Figure 24. View from picnic area located east of Bridge L9327, facing southeast (project visibility highlighted).

4.1.3 VIEWSHED FROM HILLTOP LOCATION ON GOLF COURSE

Bridge 27591 carrying Golden Valley Road over the Osseo Branch Line tracks has limited visibility (see Table 1 for definitions; see Figure 14A) from a hilltop point located southeast of the 11th green (Figure 25). A direct view to the project is only visible looking north through a clearing in the wooded areas.



Figure 25. Hilltop view from golf course at 11th green, facing north (project visibility highlighted).

4.1.4 VIEWSHED FROM SCENIC REST AREA ON WIRTH LAKE

Bridge 27237 at Highway 55 is highly visible (see Table 1 for definitions; see Figure 14A) from benches at a scenic rest area on Wirth Lake, and the bridge is also highly visible from the approach to/from these benches along the boardwalk (Figure 26). Direct views to the project are located east of this vantage point where there are no obstructions.



Figure 26. View near scenic rest area on Wirth Lake, facing east towards Bridge 27237, carrying Highway 55 over Bassett Creek, Osseo Branch Line tracks, and Luce Line tracks (project visibility highlighted).

4.1.5 VIEWSHEDS OF THE BLRT PROJECT COMPARED TO THE APE

The viewshed analysis found that the current APE captures all of the viewsheds in the Study Area except for one area in Theodore Wirth Golf Course. North of Highway 55, there is additional visibility to the project where the land is flat and vegetation is sparser (Figure 27). The area is approximately 400 feet west of the current APE boundary at its furthest point and encompasses roughly 5.5 acres outside of the current 225 acres of the APE located within Theodore Wirth Park (Figure 14A). Direct project visibility is available facing east where the project is highly visible with little to no obstruction along the proposed alignment. FTA/MnDOT CRU will need to determine if the APE should be revised to include this area.



Figure 27. View from the 6th green on Theodore Wirth Golf Course, facing east (project visibility highlighted).

4.2 Vantage Points without Views to the Proposed BLRT Project

4.2.1 SUNSET HILL (NO VISIBILITY)

This view was long advocated by Theodore Wirth but never fully realized due to delays in park land acquisition. The full viewshed from Sunset Hill at 26th Avenue North was intended to encompass more land to the south and west than is currently preserved by Valley View /Glenview Terrace parks. The full viewshed was also intended to encompass the full western expansion contemplated for Theodore Wirth Park, inclusive of Twin and Sweeney lakes (MBPC 1921:78-79, MBPC 1923:40). The current extent of parkland and its orientation, as well as adjacent development and dense vegetation in the southwestern corner of Glenview Park, do not afford any views of Theodore Wirth Park or the BLRT project area from Sunset Hill (Figure 28).



Figure 28. Current view from Sunset Hill, facing southwest. Development is in the line of sight between Sunset Hill and Theodore Wirth Park on the left; forested areas on the right form a buffer between Glenview Terrace Park and Bassett Creek.

4.2.2 VALLEY VIEW/GLENVIEW TERRACE PARK (NO VISIBILITY)

While this park is located adjacent to the alignment and just across Golden Valley Road from Theodore Wirth Park, it has no direct view of the project and only limited views of Theodore Wirth Park due to dense vegetation and topography (Figure 29). The dense forested area to the southwest does not have any paths and is not intended to be used for recreation; it functions more as a buffer. The location of a church and school further limit the line of sight to Theodore Wirth Park from Sunset Hill and through Valley View/Glenview Terrace Park. Nearing the southern boundary of Glenview Terrace Park looking directly south, limited views of the prairie and tree tops on the land sloping down towards the golf course become available. Neither Golden Valley Road nor the bridge is visible due to the rolling topography of the park and dense vegetation to the southwest.



Figure 29. View from Valley View/Glenview Terrace, west of tennis courts, facing south.

5.0 PHYSICAL DESCRIPTION

5.1 Summary and Overview

Cultural landscapes represent human interaction with the environment, including its natural features and the evidence of how humans have occupied, developed, used and shaped the landscape to suit human needs. The NPS identifies four general types of cultural landscapes as follows: historic sites, historic designed landscapes, historic vernacular landscapes, and ethnographic landscapes (NPS 1995). Theodore Wirth Park is a historic designed landscape. The NPS defines historic designed landscapes as follows:

A landscape that was consciously designed or laid out by a landscape architect, master gardener, architect, engineer, or horticulturist according to design principles, or an amateur gardener working in a recognized style or tradition. The landscape may be associated with a significant person, trend, or event in landscape architecture; or illustrate an important development in the theory and practice of landscape architecture. Aesthetic values play a significant role in designed landscapes. Examples include parks, campuses, and estates (NPS 1995).

Landscapes are defined by spatial organization and land patterns, features, and materials. The NPS defines landscape features as physical units that are part of the existing character of a landscape, can be managed as individual elements, and are identified as contributing or non-contributing to the historical significance of the landscape (NPS 2009:26). Specifically, *National Register Bulletin 18, How to Evaluate and Nominate Historic Designed Landscapes*, identifies the following list of features to consider:

- Existing topography and grading
- Natural features
- Bodies of water (natural and man-made)
- Land uses
- Circulation systems
- Spatial relationships and orientations
- Views and vistas into and out of the landscape
- Vegetation
- Buildings
- Structures
- Landscape dividers such as walls, fences, and hedges
- Drainage and engineering structures
- Site furnishings and small scale elements
- Lighting (fixtures, and the use of natural and artificial light)
- Signs
- Sculptures and other works of art (NPS 1993:3-4)

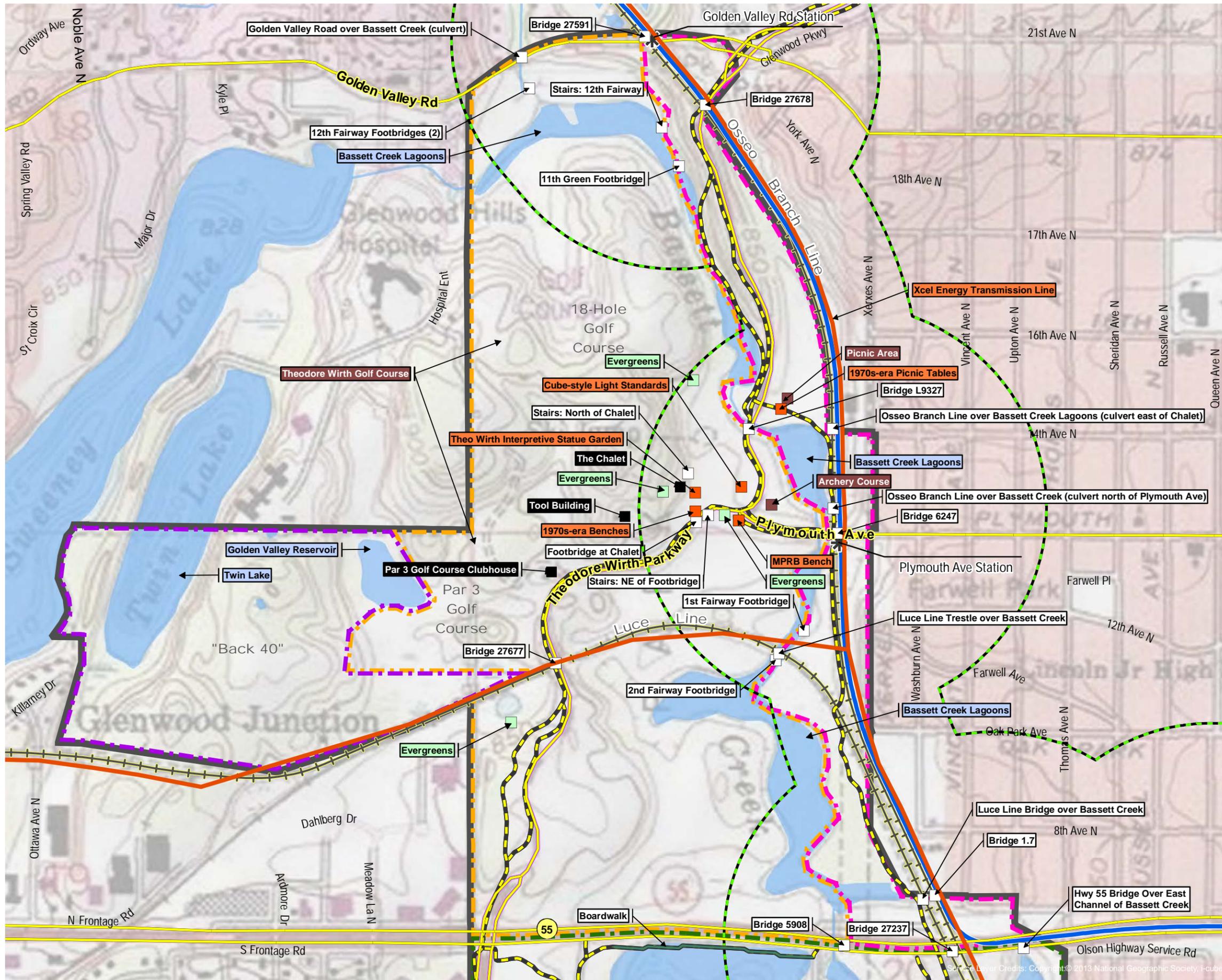
All of these features may not be present, or equally prominent, within all landscapes. Additionally, while individual features may exist as small scale-objects or as broader forms and patterns, each feature contributes to the character and identity of the whole, and in most cases, should not be viewed in isolation. Spatial organization and land patterns should be assessed first, and individual features should be assessed within context of the whole (NPS 1995).

While landscape features can be contributing or non-contributing to a cultural landscape, not all may be counted individually within an NRHP nomination under the guidance of *Bulletin 16, How to Complete the National Register Form* (NPS 1997:17). Elements such as topography, vegetation, and views and vistas, which are mentioned in the draft NRHP nomination but do not have separate inventory forms, are an important part of the cultural landscape of Theodore Wirth Park, within the Study Area, and are included in this study. The draft NRHP nomination for the GRHD states that major resources are included in the count of contributing and noncontributing resources, and that the district also includes numerous minor features and small-scale elements (i.e., signage and lighting) that are not counted as separate resources but mentioned in the nomination (Roise et al. 2012:7.1). Minor features and small-scale elements are discussed in this cultural landscape study as character-defining features. The potential for those features located within the APE and viewsheds to be contributing resources is also identified.

Theodore Wirth Park (HE-GVC00081; portion is contributing to the GRHD; individual NRHP-eligibility undetermined by MnSHPO) is a component of the Theodore Wirth Segment of the GRHD. This segment extends from the intersection of Lowry Avenue North and Theodore Wirth Parkway, south of Victory Memorial Parkway, to Wayzata Boulevard and the bridge over Interstate 394, north of Cedar Lake Parkway. It includes the full extent of Theodore Wirth Parkway (HE-GVC-0082; contributing; individual NRHP-eligibility not previously evaluated) north of Golden Valley Road and within Theodore Wirth Park; Valley View Park, which extends to the southwest from Sunset Hill on Theodore Wirth Parkway; and Theodore Wirth Park (Roise et al. 2012:7.50). Theodore Wirth Parkway links Theodore Wirth Park to the larger GRHD, with the Chain of Lakes Segment to the south and Victory Memorial Segment to the north.

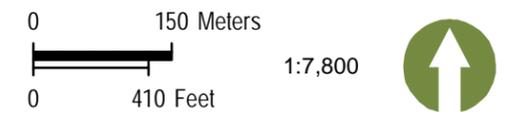
Theodore Wirth Park extends from Interstate 394 on the south, to Golden Valley Road on the north, and from France Avenue North/Sweeney Lake on the west, to Xerxes Avenue North on the east (Figures 30A and 30B). Within Theodore Wirth Park, Highway 55 is a strong east-west divider, bisecting the park into north and south components. The northern half is largely occupied by golf courses, including the original 18-hole Glenview (Theodore Wirth) Golf Course and the Par 3 Golf Course (HE-GVC-00097 and HE-GVC-00087), and nature/recreation areas. The southern half is largely occupied by the Wirth Lake and Wirth Lake Beach (where the Wirth Lake Beach House is located), picnic areas (including the Picnic Pavilion south of Glenwood Avenue), and nature/recreation areas, including the Quaking Bog, Birch Pond, and the Eloise Butler Wildflower Garden.

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- Proposed Alignment
- ✱ Proposed Station
- Architecture/History Area of Potential Effect
- ▭ Study Area
- Areas Within Park
- ▭ Golf Courses
- ▭ East Side
- ▭ Back 40
- ▭ South of Hwy 55
- Character-defining Features*
- Water
- Land Use
- Circulation: Roadway
- Circulation: Railroad Corridor
- Circulation: Regional and Paved Trail**
- Vegetation
- Building Feature
- Structure
- Site Furnishing and/or Small Scale Element***
- Transmission Line

* Primary categories for character-defining features are identified. See Section 5.2 for discussion of other categories.
 ** Trails indicated may not constitute all park trails.
 *** Features shown include previously inventoried features within the entire park and features that appear to be contributing within the APE/Viewsheds. Additional small scale features are discussed under Section 5.2.9.



Character-defining Features Within Study Area - North Half

Figure 30A

Figure 30B. Character-Defining Features within Park - South Half.

Note: Figure 30B Contains sensitive archaeological information and is not available to the public.

The most prominent character-defining features of Theodore Wirth Park include its topography and grading, water features, land uses, circulation systems, and vegetation. Other landscape features that contribute to the design and use of the park include its buildings, structures, and small scale elements (e.g. benches, picnic tables, and memorials). Figures 30A and 30B provide an overview of these character-defining features discussed in the following sections.

Within the southern half of the park, nature/recreation areas are concentrated south of Glenwood Avenue, while more formally-designated recreation spaces and activities are located to the north of Glenwood Avenue; however nature/recreation areas intentionally extend along all edges of the park. Theodore Wirth Parkway runs north-south along a circuitous route. The Osseo Branch Line (HE-RRD-002; not previously evaluated as a contributing or non-contributing resource to the GRHD; individually NRHP-eligible) forms a hard eastern boundary. The Luce Line (HE-GVC-055 [Golden Valley Segment], HE-MPC-9800[Minneapolis Segment]; not previously evaluated as a contributing or non-contributing resource to the GRHD; not eligible for NRHP listing) segments the golf course area by curving in an east-west direction roughly at the westerly extension of Oak Park Avenue North. Paved and natural surface trails traverse all portions of the park (see Figure 30A).

The 2015 Master Plan indicates that remnants of native plant communities exist throughout the park, including bogs, prairie, oak forest and oak savanna. Two bog areas are located south of Glenwood Avenue, including the Quaking Bog west of Theodore Wirth Parkway, and another smaller bog within the Eloise Butler Wildflower Garden (see Figure 30B). Several small prairie restoration areas exist at the far northern and southern edges of the park, as well as within the “Back 40” area (west of the Par 3 Golf Course) and north of Glenwood Avenue (see Figure 30A). Additionally, wet prairie areas are located throughout the Theodore Wirth Golf Course between its fairways. Native oak forest and savanna communities are primarily located north of Plymouth Avenue, and south of Glenwood Avenue (MPRB 2015:6-7). Bassett Creek runs in a north-south direction along the eastern edge of the park, from Glenwood Avenue to Golden Valley Road. A series of lagoons constructed by the CWA, CCC, and WPA were formed along its route as an enhancement to the golf course (see Figure 30A).

For the purposes of this study, and to facilitate discussion of the character-defining features, the Study Area was divided into the following four areas:

- Golf Course;
- East Side;
- Back 40 (west of golf courses and north of Highway 55); and
- South of Highway 55 (see Figures 30A and 30B).

The **Golf Course Area** accounts for approximately 36 percent of the area in Theodore Wirth Park and is characterized by its quiet recreational uses, including golf and winter recreation. Its topography is hillier to the north with wooded areas interspersed between the fairways. Bassett Creek is also a character-defining feature. The nature/recreation areas of Bassett Creek, which act as an important buffer for Theodore Wirth Park, offer recreation features such as trails and fishing opportunities.

The **East Side** comprises a narrow portion of the Study Area east of the golf courses and north of Highway 55. Bassett Creek borders this area as an important nature/recreation area. The East Side also contains several circulation routes, including: Theodore Wirth Parkway, the Osseo Branch Line, and a regional park trail that runs parallel to the Osseo Branch Line roughly between Highway 55 and Oak Park Avenue North. The portion of this area that is located north of 16th Avenue contains steep slopes, ridges, and more dense oak forest areas, while the portion south of 16th Avenue is more level and contains wetlands and sparse, second-growth forest vegetation.

The **Back 40** (west of the golf courses and north of Highway 55) is another small area mainly comprising what is commonly referred to as the “Back 40” area of the park. It is roughly defined by the Luce Line on the south, the isthmus between Sweeney and Twin Lakes on the west, the Regency Hospital and Hidden Oaks residential neighborhood on the north, and the Par 3 Golf Course on the east. This area was part of the last major acquisition of parkland in 1957. It contains a portion of Twin and Sweeney Lakes, more dense oak forest vegetation, and a small area of restored prairie vegetation.

The area **South of Highway 55** is the largest, oldest, and most diverse area, accounting for approximately 45 percent of the area in Theodore Wirth Park. It contains the remainder of the Study Area within Theodore Wirth Park. Its major features include Wirth Lake and Wirth Lake Beach (where the Wirth Lake Beach House is located), the Picnic Pavilion, the Quaking Bog, the Eloise Butler Wildflower Garden, and the southernmost lagoon that is a feature of the Bassett Creek Lagoons.

The following subsections of this report are organized to provide:

- A general description of the character-defining features in each of these four areas of the Study Area (Section 5.1.1 to Section 5.1.4);
- More detailed descriptions of the character-defining landscape features located within the APE and viewsheds (Section 5.2); and
- Identification of contributing features within the APE and viewsheds (Section 5.4).

The following information is noted for features that have been previously inventoried and evaluated, either as part of the current draft NRHP nomination for the GRHD or as part of previous studies: MnSHPO inventory numbers, construction dates, current contributing or non-contributing status from the draft NRHP nomination for the GRHD, and individual eligibility for listing in the NRHP for features with previous determinations by MnSHPO. This information is noted in the text below and summarized for all features in Appendix A.

Since MnSHPO has determined that the GRHD and its associated resources, as identified in the draft NRHP nomination, are eligible for listing in the NRHP, the draft nomination has been relied upon as a basis for identifying contributing and non-contributing features within the currently documented period of significance (ending in 1942) for the purposes of Section 106 compliance. Features post-dating 1942 are further documented through this cultural landscape study. Features outside of the current period of significance (ending in 1942) and identified as non-contributing in the draft NRHP nomination may now be contributing within the potential extended period of significance. These features are noted across the Study Area and are discussed in more detail within the APE and viewshed discussion in Section 5.4

Contributing Features within the APE and Viewsheds. Additionally, features that have been individually determined eligible or not-eligible for the NRHP are identified.

5.1.1 GOLF COURSE AREA

This area encompasses 273.1 acres (110.5 hectares) of the Study Area and is primarily devoted to active golf course uses (Figures 31-32; also see Figure 30A). Its major components include: the original 18-hole Theodore Wirth Golf Course (HE-GVC-00097; contributing; individual NRHP-eligibility not previously determined) constructed 1916-1937; the Par 3 Golf Course (HE-GVC-00087; non-contributing in the draft NRHP nomination, but falls within the potential extension of the period of significance to 1975; individual NRHP-eligibility not previously determined) constructed in 1961; and the winter recreation area (an additional land use within the two golf courses) (see Figure 30A). Its topography features steep slopes and ridges, rolling hills, and flat lowland areas. Grading was completed as part of the golf course construction, siting of the 1919-1922 Chalet (HE-GVC-00015; contributing to the GRHD; individual NRHP-eligibility not previously determined), and routing of Theodore Wirth Parkway (HE-GVC-00082; contributing; individual NRHP-eligibility not previously determined) constructed from 1891-1921. Bassett Creek and its engineered lagoons (HE-GVC-00089; contributing to the GRHD; individual NRHP-eligibility not previously determined) run the entire eastern and northern lengths of this area; the lagoons date from 1922 to 1934. Bassett Creek roughly forms an eastern boundary to this area, except for the portion between Farwell Avenue and Bridge L9327 (HE-GVC-00050; contributing to the GRHD; individually NRHP-eligible) where it curves beyond the area dedicated to Theodore Wirth Golf Course. While the original 18-hole golf course was developed in the late 1910s, the Par 3 Golf Course was not developed until the early 1960s after that land was acquired for park use (MPRB 2010:27).

The winter recreation area is an additional land use within the Theodore Wirth Golf Course and Par 3 Golf Course areas and offers the following recreation activities: cross-country skiing, snowboarding, snow tubing, snowshoeing, and skijoring. A snowboard park is located behind the Chalet. Tubing occurs on the 10th fairway hill with towropes available for assistance. Snowboarding occurs in the vicinity of the 17th Green on the 18-hole course (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 9, 2015). Snowshoeing occurs on the off-road cycling trails west of Theodore Wirth Parkway, at the Par 3 Golf Course and “Back 40” areas. Ski trails are also located throughout the golf course.



Figure 31. Representative photograph of Golf Course Area, facing west.



Figure 32. Representative photograph of Golf Course Area, facing northwest.

Hard boundaries are formed by major roadways north and south of the Golf Course Area, including Golden Valley Road to the north and Highway 55 to the south. Theodore Wirth Parkway runs mostly along the eastern edge of this area; however, it begins at the far western side of the area where it crosses Highway 55, until it hits the Luce Line tracks (HE-GVC-055; not previously determined a contributing or non-contributing feature to the GRHD; not-eligible for NRHP listing), where it turns northeast until it reaches Plymouth Avenue and continues north to Golden Valley Road. The Luce Line tracks also traverse

this area. The segment between Minneapolis and Hutchinson was constructed between 1909 and 1916 (106 Group 2012d). Additionally, Plymouth Avenue provides a scenic eastern approach to the Chalet.

The Chalet (HE-GVC-00015; contributing to the GRHD; individual NRHP-eligibility not previously determined) is the most prominent building within this area, as well as within Theodore Wirth Park as a whole. The Tool Building (HE-GVC-00086; contributing to the GRHD; individual NRHP-eligibility not previously determined), located southwest of the Chalet, was constructed in 1930 and designed to reflect the architectural style of the Chalet (Pearson 2008h). The 1960s Par 3 Golf Course Clubhouse (HE-GVC-00085; historic name “Par 3 Short Course Clubhouse”; non-contributing but subject to review if period of significance is extended to 1975; individual NRHP-eligibility not previously determined) was also constructed southwest of the Tool Building for the Par 3 Golf Course. Other structures located in the Golf Course Area include: Bridge L9327 (HE-GVC-00050; contributing to the GRHD; individually NRHP-eligible) constructed in 1940 and also designed to reflect the Chalet with its stone facing; the Luce Line Trestle over Bassett Creek bridge (HE-GVC-376; not previously determined as a contributing feature to the GRHD; individually not-eligible for NRHP-listing); and the Luce Line over Bassett Creek bridge (HE-MPC-5285; not previously determined as a contributing feature to the GRHD; individually not-eligible for NRHP listing) constructed ca. 1913. Several footbridges (not previously inventoried or evaluated) are also located throughout the golf course, allowing players to pass over Bassett Creek multiple times and once over Theodore Wirth Parkway near the Chalet. The Theodore Wirth Interpretive Statue Garden (HE-GVC-00098; non-contributing; individual NRHP-eligibility not previously determined) was installed in 2004 and is located in front of the Chalet. Three sets of newer wooden and concrete steps are set into hillside areas near the Chalet and in the far northern section of the golf course. A variety of small scale elements, including benches, picnic tables, signage, and lighting, are located throughout the area dating to various eras.

The Golf Course Area is largely covered by managed turf grass; however, portions of wet prairie, oak forest and second growth mixed forest (containing a mix of non-native volunteer and planted species that do not resemble known native plant communities and mostly developed from areas previously cleared for human use) are interspersed throughout the course (MPRB 2015:6.8). The hills to the west of the Chalet and much of the winter recreation area are also wooded. A variety of evergreen tree groupings are located throughout the course. Groupings of evergreen plants near the Chalet, along Plymouth Avenue, and within the winter recreation area are in keeping with Wirth’s original design intent for the park.

5.1.2 EAST SIDE AREA

This area is a narrow, linear, north-south strip of land located north of Highway 55 and east of the golf courses (Figures 33-34; also see Figure 30A). Bassett Creek is the approximate boundary between this area and the Golf Course Area. The area north of Highway 55 and east of the Golf Courses encompasses approximately 71.5 acres (28.5 hectares) of the Study Area. The segment of Theodore Wirth Parkway located northeast of the Chalet runs along a ridge between Bassett Creek and the Osseo Branch Line tracks (HE-RRD-002; individually NRHP-eligible). The Osseo Branch Line was constructed in 1881. Remnants of native oak forest communities are present, as well as a small portion of restored prairie near the intersection of Golden Valley Road and Theodore Wirth Parkway. MPRB staff have indicated that the woodland on the western edge of the Osseo Branch Line corridor near the proposed Golden Valley station

contains high-quality, old growth oaks (Personal Communication, Bruce Chamberlain, Assistant Superintendent for Planning, MPRB, September 24, 2013). These native communities are punctuated with various species of evergreen trees, likely intended as additional screening around the park perimeter and in keeping with the historic design intent of Theodore Wirth Park. Chestnut trees have also been identified along the slope adjacent to the Osseo Branch Line (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).



Figure 33. Representative photograph of East Side Area, facing northwest.



Figure 34. Representative photograph of East Side Area, facing west.

Several paved trails for walking and biking, as well as unpaved unauthorized trails, are located in this area. A total of 12 railroad-related and road-related bridges are located in this area. These bridges are summarized in Table 2 below. Among this total, the bridges that are located within the APE and viewsheds are detailed further in Section 5.2.8 Structures in the APE and Viewsheds. The bridges that have been previously inventoried as part of the draft NRHP nomination, or individually as part of the statewide survey of historic properties on file at MnSHPO, are included in Appendix A.

Table 2. Summary of Bridges Located in the East Side Area

Inventory No.	Bridge No.	Contributing/Non-Contributing Status (C/NC)	Individual NRHP-Eligibility
ROAD-RELATED BRIDGES			
HE-GVC-00049	6247	NC	Not Eligible
HE-GVC-00050	L9327	C	Eligible
HE-GVC-00091	27678	NC	Not Previously Determined
Not Available	27591	Not Previously Determined	Not Previously Determined
HE-GVC-00056	5908	NC	Not Previously Determined
HE-MPC-5287	27237	NC	Not Eligible
HE-MPC-5288	Highway 55 Bridge over East Branch of Bassett Creek	Not Previously Determined	Not Eligible
RAILROAD-RELATED BRIDGES			
Not Available	Not Available (culvert carrying Osseo Branch Line over Bassett Creek, north of Plymouth Ave.)	Not Previously Determined	Not Previously Determined
Not Available	Not Available (culvert carrying Osseo Branch Line over Bassett Creek, east of Chalet)	Not Previously Determined	Not Previously Determined
HE-GVC-376	Not Available	Not Previously Determined	Not Eligible
HE-MPC-5285	Not Available	Not Previously Determined	Not Eligible
HE-MPC-5286	1.7	Not Previously Determined	Not Eligible

Small areas of land are reserved for picnicking and for archery north of Plymouth Avenue. Areas south of Plymouth Avenue are largely unmanaged wetlands. A well-used regional trail runs adjacent to the Osseo Branch Line tracks with a small segment crossing railroad ROW. The pavement is deteriorated in multiple segments, including areas with standing water. An unmarked rail crossing is located roughly at

Oak Park Avenue North and does not have any barriers to access or crossing. This part of the park has been used as a natural buffer along the edge of the park, first shown in the 1914 plans, and was indicated as a nature area in the 1980 *Long Range Improvement Plan*. The trail adjacent to the Osseo Branch Line is currently planned as a natural area trail in the 2015 Master Plan (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

5.1.3 BACK 40 AREA

This area encompasses approximately 77.7 acres (31.4 hectares) of the Study Area (see Figure 30A). Acquired in 1957, this area is part of the remaining tract of land originally identified by Theodore Wirth in 1922 (along with land for the Par 3 Golf Course in the Golf Course Area) that would have included all of Sweeney and Twin lakes (Figures 35-36). Hard edges are formed by the Luce Line tracks to the south, while a residential development is located to the north. This area currently takes in the southern half of Twin Lake and the isthmus between Sweeney and Twin Lakes, as well as a section of the Sweeney Lake shore. It is generally characterized by rolling topography and remnants of native oak forest and savanna communities, as well as maple-basswood forest, restored prairie, and small forested wetlands (MPRB 2015). Paved trails and designed natural surface trails run through this area. The Golden Valley Reservoir is located in the northeastern corner of this area.



Figure 35. Representative photograph of Back 40 Area (MPRB 2015).



Figure 36. Representative photograph of Back 40 Area (MPRB 2015).

5.1.4 SOUTH OF HIGHWAY 55 AREA

This area comprises the oldest portion of the park and contains the greatest diversity in land uses and vegetation (See Figure 30B). It is also the largest area of the Study Area, encompassing approximately 345.6 acres (139.9 hectares). Its northern and southern boundaries are defined by major roadways, including Highway 55 to the north and Interstate-394 to the South. Glenwood Avenue runs loosely east-west in the middle of this area and Theodore Wirth Parkway runs north-south throughout this entire area. Bridge 27607 (HE-MPC-01907; non-contributing to the GRHD; individual NRHP-eligibility not previously determined) carries Glenwood Avenue over Bassett Creek, the Osseo Branch Line and the Minneapolis Segment of the Luce Line (HE-MPC-9800; not previously determined a contributing or non-contributing resource to the GRHD; individually not eligible for NRHP listing). Just north of Glenwood Avenue, Bridge 1.4 (not previously inventoried or evaluated) carries the Osseo Branch Line over Bassett Creek. North of Glenwood Avenue, this area extends roughly from the extension of France Avenue North on the west to Sheridan Avenue North on the east. South of Glenwood Avenue, this area extends roughly from France Avenue South to Xerxes Avenue South. Land north of Glenwood Avenue has comparatively flatter topography, while land to the south is characterized by rolling hills, steep slopes and ridges, and areas of high-quality native vegetation. Wirth Lake (HE-GVC-00094; contributing; individual NRHP-eligibility not previously determined) is a central feature of this area that is located south of Highway 55 and north of Glenwood Avenue. Land immediately east of Wirth Lake is occupied by formally-designated recreation areas.

Wirth Lake Beach (HE-GVC-00093; contributing; individual NRHP-eligibility not previously determined) features the 2004 Wirth Lake Beach House (HE-GVC-00092; non-contributing; individual NRHP-eligibility not previously determined), volleyball courts, a basketball court, picnic tables and shelters, a seating area beneath a pergola, playground equipment, and a parking lot (Figure 37). Wirth Lake Beach was also historically the site of the Aqua Follies Aquatennial Celebration (non-extant). The

JD Rivers' Children's Garden occupies a small portion of land located north of Glenwood Avenue near Vincent Avenue North.¹ Two picnic areas are located east of Wirth Lake: Picnic Ground No. 4 (not previously inventoried or evaluated as a separate feature within Theodore Wirth Park) north of Glenwood Avenue and the 1930 Picnic Pavilion (HE-GVC-00083; contributing; NRHP eligibility not previously determined) south of Glenwood Avenue (Figure 38). Picnic tables, benches, a sand box, and grills are sited on the hilly area in Picnic Ground No. 4. Immediately south of Wirth Lake and Wirth Lake Beach, additional picnic tables are sited at the northern foot and along the northern slope of a hill leading up to the Picnic Pavilion. The hilltop location of the pavilion affords scenic views of Wirth Lake and Wirth Lake Beach to the west, forested areas to the northeast, and hilly, forested areas to the south. The 1937 Glenwood Line Streetcar Shelter (HE-GVC-00100; contributing; individual NRHP-eligibility not previously determined) and streetcar line corridor are also located at the northern foot of this hill, adjacent to Glenwood Avenue (Figure 39).



Figure 37. Wirth Beach, facing east.

¹ The name, "JD Rivers' Children's Garden," is stated here as indicated by the MPRB on their website, https://www.minneapolisiparks.org/parks__destinations/gardens__bird_sanctuaries/jd_rivers_childrens_garden/.



Figure 38. Picnic Pavilion (northeast elevation), facing southwest.



Figure 39. Glenwood Streetcar Shelter, facing east.

Land west of the lake was historically occupied by the Park Board Nursery (and previously the Keegan-Schell Farmstead [21HE0405; not previously determined a contributing or non-contributing feature to the GRHD; individual NRHP-eligibility not previously determined]) that supplied much of the designed vegetation for the park. It still contains a few remnants of cultivated plants and a root cellar, and now is largely restored prairie. Generally, areas south of Glenwood Avenue excluding the Picnic Pavilion and picnic areas are more ‘natural.’ The Quaking Bog (HE-MPC-01906; contributing; individual NRHP-

eligibility not previously determined) and Eloise Butler Wildflower Garden (HE-GVC-05098; contributing; individual NRHP-eligibility not previously determined), located outside of the APE and viewsheds identified for this project, comprise approximately 20 acres (8.1 hectares) and represent some of the greatest biodiversity in the area (Figures 40 and 41). The 1970 Martha E. Crone Visitor's Shelter (HE-MPC-01899; non-contributing, but subject to review if the period of significance is extended to 1975; individual NRHP-eligibility not previously determined) is located in the Eloise Butler Wildflower Garden. Vegetation in the outlying areas is largely characterized as oak forest and oak savanna communities. Birch Pond (HE-MPC-01898; contributing; individual NRHP-eligibility not previously determined) is another prominent water feature in the area South of Highway 55, located east of the Quaking Bog and southwest of the Eloise Butler Wildflower Garden, and east of Theodore Wirth Parkway. It is the smallest water feature in Theodore Wirth Park, at two acres, whereas the Bassett Creek Lagoons are 38 acres combined.



Figure 40. Entrance to Eloise Butler Wildflower Garden, facing east (modern gateway).



Figure 41. Quaking Bog, facing west (MPRB 2015).

Remnants of the 1917 Loring Cascade (HE-GVC-00099; non-contributing; individual NRHP-eligibility not previously determined) and Great Medicine Spring are located at the southwestern corner of Wirth Lake, near the intersection of Glenwood Avenue and Theodore Wirth Parkway (MPRB 2015:5.7,5.10). The 1958 Finnish-American Monument (HE-GVC-00095; non-contributing but subject to review if the period of significance is extended to 1975; individual NRHP-eligibility not previously determined) stands in the center of Picnic Ground No. 4. The 1921 Victory Memorial Drive Boulder (HE-MPC-01910; contributing; individual NRHP-eligibility not previously determined) is located at the southern entrance to Theodore Wirth Park, where it intersects with Interstate-394. [REDACTED]

[REDACTED]

[REDACTED]. The stretch of Theodore Wirth Parkway south of Glenwood Avenue contains the largest concentration of original evergreen plantings from Wirth’s design, located roughly between I-394 and Glenwood Avenue (Pearson 2002:10). Historic (pre-1942) evergreen plantings have also been identified west of Theodore Wirth Parkway and south of the Luce Line in the 2015 Master Plan (MPRB 2015:5.7). Topography in this area is the most varied including rolling hills primarily southeast and northwest of the intersection of Glenwood Avenue and Theodore Wirth Parkway, as well as flatter areas around Wirth Lake.

5.2 Character-Defining Features in the APE and Viewsheds

The current BLRT APE encompasses the eastern side of the park, primarily lying north of Highway 55 (see Figure 1). Since the proposed alignment runs in a north-south direction between Golden Valley Road and Highway 55, and curves eastward at Highway 55, its route does not traverse the southern half of the park; however, a limited portion of the park located south of Highway 55 falls within the current APE. Therefore, the current APE primarily encompasses features described within the East Side in Section 5.1, and also includes features described in a *portion* of the Golf Course Area and the area South of Highway 55; it *does not* include any features described within the Back 40 Area. As a result of field survey, the current APE was also found to capture all of the viewsheds to the project except for a 5.5-acre area in Theodore Wirth Golf Course located north of Highway 55. Since the extent of this area is limited and does not contain any additional features than those that are located within the APE, the discussion of character-defining features within the APE and viewsheds pertains to the same set of landscape features.

Character-defining features define the overall physical quality of the landscape in terms of its current and historic features. More intensive level survey was completed to document character-defining features within the APE and identified viewsheds where the project is visible from within the Study Area. Prominent landscape features in the APE and viewsheds include topography, water features, vegetation, golf course and picnic area land uses, circulation systems, the Chalet, and several bridges. Other landscape features present within the APE and viewsheds include views related to the original design intent of the park, small-scale elements, and lighting. One archaeological resource is also present within the APE representing the Germania Brewery (21HE407; contributing status to the GRHD undetermined; individually NRHP-eligible). Character-defining features within the APE and viewsheds are described below as a baseline for identifying contributing and non-contributing features within the APE and viewsheds for the proposed BLRT project.

5.2.1 TOPOGRAPHY IN THE APE AND VIEWSHEDS

Topography was shaped by natural geographic processes over thousands of years, and altered more recently by grading and design (see Figures 30A and 30B showing contour lines). Wirth recognized the scenic value of the contours, wooded hills and Bassett Creek Valley as a great opportunity to develop an extensive natural park. Theodore Wirth Parkway was designed to follow the natural topography modeling the scenic pleasure drives of country parks (Figure 42). Wirth described how the roadway should feature easy curves following the foot of wooded hills and gradually rising to narrow oak covered ridges (MBPC 1911:103). He also remarked in the Annual Report for the year 1921 that the Chalet "is happily located on the side of a wooded hill" (MBPC 1922:71). Most of the land contours in Theodore Wirth Park, including the steep slopes, ridges and valleys, have been shaped by natural processes, while grading was necessary for construction of the golf course, Chalet, bridges, and route of Theodore Wirth Parkway.



Figure 42. Ascending north on Theodore Wirth Parkway along a ridge (past Bridge L9327), facing north.

5.2.2 BODIES OF WATER / WATER FEATURES IN THE APE AND VIEWSHEDS

Bassett Creek Lagoons and Wirth Lake are the primary water features located within the APE and viewsheds (see Figures 30A and 30B). Approximately 13% of Wirth Lake is located within the APE and viewsheds. Wirth Lake and Bassett Creek are natural features that have been transformed into designed landscape features by dredging and fill activities; the lagoons are an entirely man-made design feature. When the lagoons were created, sediment was dredged from Bassett Creek and used for grading the golf course (MPRB 2015:6.4). The design of the lagoons significantly altered Bassett Creek's natural course to create a scenic amenity and develop more suitable land for the golf course. Excavation work for the lagoons was first begun by CWA crews in the fall of 1933 and continued by the CCC in 1935 (Wirth 2002:105). Wirth's *Map of Projected Development of a System of Lagoons in Glenwood Park* contained seven lagoons along the creek's segment between Golden Valley Road and Highway 55 (MBPC 1936:110a). The completed lagoons reclaimed 65 acres of swampland and 35 acres of wasteland (MBPC 1937:121). Today, the lagoons cover seven acres of the Study Area and include two additional lagoons located south of Highway 55. Bassett Creek runs 2.5 miles through the Study Area. The current layout and form of these features is largely similar to Wirth's 1937 plan, with the exception that two of the lagoons north of Highway 55 exist more in the form of wetlands than water bodies, and the two additional lagoons located south of Highway 55 exist (Figure 43). Wirth Lake is a prominent and central character-defining feature of the park (Figure 44). Wirth Lake and Bassett Creek Lagoons have been previously evaluated and identified as contributing features to the GRHD (Roise et al. 2012; MPRB 2015).



Figure 43. Bassett Creek and "Lagoon N," as indicated in Wirth's 1937 plan, facing northwest.



Figure 44. Wirth Lake from Picnic Ground No. 4, facing west.

5.2.3 LAND USE IN THE APE AND VIEWSHEDS

Theodore Wirth Golf Course is the predominant land use north of Highway 55 (Figure 45; also see Figure 30A). Other land uses present include the winter recreation area located on the hills of the golf course that are both north and west of the Chalet within the APE and viewsheds, and a smaller picnic area and archery area east of the Chalet. Theodore Wirth Golf Course and the winter recreation area have been

previously evaluated and identified as contributing resources to the GRHD (Roise et al. 2012, MPRB 2015).

Winter recreation has been highly popular at Theodore Wirth Park since its original acquisition. While the types of winter sports have evolved over the years, the park's large acreage, alpine character, and rolling topography provide excellent grounds for a variety of activities (Figure 46). Historically, these activities have been concentrated on the slopes of the golf course located to the west and north of the Chalet. A snowboard park is located west of the Chalet while tubing occurs on the 10th fairway north of the Chalet. Cross-country skiing and snowshoeing trails extend across the entire park.



Figure 45. Theodore Wirth Golf Course, view toward the 14th and 15th fairways, facing south.



Figure 46. Winter recreation area along the 10th fairway, facing north.

Picnic Ground No. 4, located east of Wirth Lake, is the predominant land use south of Highway 55 within the APE and viewsheds (see Figure 30B). Picnic Ground No. 4 has a pastoral character created by the rolling hills, picturesque groupings of trees, and expansive views across the lake (Figure 47). The JD Rivers' Children's Garden located to the southeast provides a venue for MPRB youth gardening programs and art projects. While the site is small, it has high visibility from Glenwood Avenue and exhibits an artistic, vernacular appearance. The garden is a more contemporary feature of the park, established in 1982 (Personal Communication, MaryLynn Pulscher, MPRB, July 8, 2015). Wirth Lake offers a fishing dock on the eastern shore of the lake, and west of Picnic Ground No. 4 (see Figure 30B). Swimming areas at Wirth Beach are visible from the picnic grounds, but do not lie within the APE or viewsheds. A floating boardwalk across Wirth Lake offers benches where expansive views of the lake to the south and the golf course to the north can be appreciated.



Figure 47. Picnic Ground No. 4, showing WPA picnic benches and evergreen plantings, facing south.

Major recreational activities throughout the APE and viewsheds include disc golfing, geocaching, orienteering, environmental programming, weddings and special events, fishing, walking, hiking, trail running, bicycling, off-road cycling, non-motorized boating, gardening, picnicking, snowshoeing, cross-country skiing, skijoring, snow tubing and sledding, swimming, sand volleyball (MPRB 2015).

5.2.4 CIRCULATION SYSTEMS IN THE APE AND VIEWSHEDS

5.2.4.1 Roads

Vehicular circulation systems define the northern and southern boundaries of the park, and traverse the park in both north-south and east-west directions. The two major roadways within the APE and viewsheds include Highway 55 and Golden Valley Road. Early plans for Theodore Wirth Park show alternatives for Highway 55 (originally 6th Avenue North) by-pass routes around the natural northern shore of Wirth Lake. The highway runs in an east-west direction, forming a major division in the park, and was widened to four lanes in the 1950s (Figure 48). Highway 55, currently known as Olson Memorial Highway, is classified as a principal arterial roadway with average annual daily traffic counts of 26,000 in 2007, the most recent year for which data is available (Metropolitan Council 2015, MnDOT 2015). Golden Valley Road (originally 19th Avenue North) forms the northern boundary of the park. It is classified as minor augmentor roadway with average annual daily traffic counts of 8,300 in 2007, the most recent year for which data is available (Metropolitan Council 2015, MnDOT 2015). Glenwood Avenue runs east-west through the park providing access to Wirth Lake and Picnic Ground No. 4. Theodore Wirth Parkway has been previously evaluated and identified as a contributing resource to the GRHD (Roise et al. 2012, MPRB 2015).



Figure 48. Highway 55 from boardwalk on Wirth Lake, facing north.

Theodore Wirth Parkway followed the model of parkways across the Grand Rounds, first being graded and covered in gravel, and later paved as auto traffic increased (Figure 49). Originally constructed between 1911 and 1915, it provided a major access point through the park and linked it to the larger park system. Eckbo improvements in the early 1970s narrowed Theodore Wirth Parkway from 34 feet to 24 feet, installed a parking bay and concrete curbs, installed paved bicycle and pedestrian paths, and introduced rose-chip sealed pavement to create unity within the Grand Rounds system. The MPRB has begun re-introducing this pavement to the parkway system in 2014. Its current route follows the alignment from historical plans and aerial photographs, except where it intersects with Plymouth Avenue.

The current location and design of the parking lot at the Chalet has been altered in comparison to historical plans and photographs. The parking lot was first shown as a smaller area located east of Plymouth Avenue in the *Map of Projected Development of a System of Lagoons in Glenwood Park*, and appears as a similar size and in a similar location in aerial photographs from 1945 through 1971 (MBPC 1937:110, ASCS 1945, ASCS 1971). The expansion likely required modification of the intersection between Theodore Wirth Parkway and Plymouth Avenue, since historical aerial photographs indicate that Theodore Wirth Parkway was later shifted south (ASCS 1971, ASCS 1979). MPRB staff have indicated that the parking lot expansion and rerouting of Theodore Wirth Parkway occurred roughly between 1969 and 1979 (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). However, the re-alignment of this intersection and parking lot reconfiguration were not indicated in the Eckbo Plan. Therefore, the current parking lot does not appear to be a historic feature. MPRB staff indicated that, during the same timeframe, the approach to the Chalet was altered. The entry walk was changed from a straight approach with stairs and hedges, to the current curved walk as an accessibility improvement, and the patio stairs were closed (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). The extension of Plymouth Avenue by 1922 was an important gateway into the park that Wirth considered an integral component of the Grand Rounds

system. It provides a scenic eastern approach to the Chalet at the midpoint of the Theodore Wirth Golf Course (Figure 50). The roadway follows its historic alignment, except for the intersection with Theodore Wirth Parkway, and is surrounded by a wooded area near Bridge 6247 (HE-GVC-00049; non-contributing to the GRHD; not eligible for individual NRHP listing). The bridge deck, railings, and light fixtures of Bridge 6247 were reconstructed in 2006; the style of the railings and fixtures are modern and are dissimilar in appearance to the historic structure. Plymouth Avenue and Bridge 6247 are discussed further in Section 5.4.1.2.



Figure 49. Theodore Wirth Parkway at Bridge L9327, facing northwest.



Figure 50. Plymouth Avenue approach to the Chalet, facing west.

5.2.4.2 Railroads

Two railroad lines traverse the park and impact its spatial organization. The Osseo Branch Line (HE-RRD-002; not previously identified as a contributing feature to the GRHD; individually NRHP-eligible) forms a hard eastern boundary which likely followed existing topography. This railroad line is comprised of a single track mainline that rests on a raised bed of granite ballast. The tracks are comprised of wood ties with jointed steel rails. The Osseo Branch Line has an approximately 100-foot ROW. North of Glenwood Avenue, the Osseo Branch Line enters Theodore Wirth Park and travels through a wooded area. Just north of Glenwood Avenue, the line is carried over Bassett Creek by the Osseo Branch Line Bridge No. 1.4 (not previously inventoried or evaluated), which is a double concrete culvert/pipe built in 1943 that replaced an earlier wood trestle. Approximately 350 feet to the north, the line crosses Bassett Creek on Osseo Branch Line Bridge No. 1.7 (HE-MPC-5286; not previously determined as a contributing features to the GRHD; not eligible for individual NRHP listing), which is a four-span, reinforced concrete deck bridge built in 1914. Approximately 600 feet up the line, near the intersection of Xerxes and Eighth Avenues North, the Osseo Branch Line runs parallel with the Luce Line at MW Junction (installed 1915). Just north of MW Junction, the Luce Line curves and heads west into Golden Valley (HE-GVC-055). The Osseo Branch Line then passes over a wetland area on a raised roadbed of riprap. After curving north, the line enters a long forested cut through Theodore Wirth Park until it reaches Golden Valley Road (106 Group 2012c).

North of Glenwood Avenue the Minneapolis Segment of the Luce Line (HE-MPC-9800; not previously determined as a contributing feature to the GRHD; not eligible for individual NRHP listing) enters Theodore Wirth Park and travels through a wooded area. Additionally, the tracks cross the east channel of Bassett Creek at Bridge 1.4. Approximately 350 feet to the north, the line crosses Bassett Creek on the Luce Line Bridge over Bassett Creek (HE-MPC-5285; not previously determined as a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing) that is now mostly covered by fill. About 1,000 feet up the line at Mile Post 1.7, near the intersection of Xerxes and Eighth Avenues North, the Golden Valley Segment of the Luce Line interchanges with the Osseo Branch Line at MW Junction in Theodore Wirth Park. The junction is comprised of a crossover track between the two lines. At the west end of the junction the Luce Line leaves Minneapolis and enters Golden Valley (HE-GVC-055; not previously determined as a contributing feature to the GRHD; not eligible for individual NRHP listing), where it effectively segments Theodore Wirth Golf Course. The railroad tracks consist of steel rails with wood ties set in ballast on a raised roadbed (106 Group 2012d). The current ROW width ranges from 80 feet to 150 feet along its course through Theodore Wirth Park. The tracks cross Bassett Creek Lagoons at a second point on the Luce Line Trestle over Bassett Creek (HE-GVC-376; not previously determined contributing or non-contributing to the GRHD; not eligible for individual NRHP listing).

5.2.4.3 Paths and Trails

A paved bicycle and pedestrian path (in some areas combined, and in others, separated) runs adjacent to the full length of Theodore Wirth Parkway from Golden Valley Road to I-394. This pathway was recommended in Eckbo's 1971 plan. Another paved trail runs along the creek and the Osseo Branch Line tracks through areas adjacent to lagoons and wetlands. The location and alignment of this route are similar to recommendations contained in the Eckbo's 1971 plan. The trail begins at Highway 55 and ends

at the picnic area located east of Bridge L9327. However, it does not contain a grade-separated crossing at the tracks as recommended in the Eckbo Plan. All-season, earthen off-road pedestrian and bike trails are also available mostly west of the parkway in nature/recreation areas. Portions of groomed ski trails traversing Theodore Wirth Golf Course lie within the APE and viewsheds. These trails accommodate classic and skate-style cross-country skiing and connect up to regional trails extending through Golden Valley and the Chain of Lakes (MPRB 2015:4.7). Figure 51 shows an example of paved pathways. Rogue pedestrian pathways have also been formed through repeated usage, which are unauthorized by MPRB and will be closed in the future (Figure 52). No paths or trails have been previously identified as contributing resources to the GRHD; however, a formal evaluation of the pathways related to the Eckbo Plan has not been completed yet. It appears these pathways would be contributing features, as discussed further in Section 5.4 Contributing Features in the APE and Viewsheds.



Figure 51. Example of paved pathway along Bassett Creek, facing south.

Pedestrian paths existed throughout the park's history and are documented in historical plans and aerial photographs. A series of paths were already present in the park when Wirth developed his 1914 plan. However, the alignment of current paths located in the APE and viewsheds does not follow the alignment of these trails in most locations. A review of historic plans and aerial photographs indicates that select segments near Picnic Ground No. 4 appear to follow the alignment of pathways that were either shown in the 1914 plan, or were installed within the potential extended period of significance through 1975. These segments appear to be contributing features to the GRHD and are discussed further under Section 5.4 Contributing Features Within the APE and Viewsheds.



Figure 52. Example of unpaved paths through restored prairie, at Theodore Wirth Parkway and Golden Valley Road, facing west.

5.2.5 VIEWS AND VISTAS IN THE APE AND VIEWSHEDS

The Theodore Wirth Segment of the GRHD – inclusive of Sunset Hill, Valley View/Glenview Terrace Park, Theodore Wirth Parkway, and Theodore Wirth Park – was intentionally designed to capture scenic views afforded by the rolling topography. Historical photographs depict several vantage points where visitors would gather at the edges of bridle paths and atop high points of the golf course to view the extents of the park and city beyond (Figure 53). Additionally, the Chalet was sited on a hillside at the intersection of Plymouth Avenue and Theodore Wirth Parkway, with the alignment of these roads offering scenic views while approaching the Chalet. The southbound approach to Theodore Wirth Parkway at Golden Valley Road was routed to take advantage of the natural contours and scenic views of Theodore Wirth Park and the countryside beyond to the west. Wirth remarked about the picturesque views that this section of the parkway could offer by winding along the ridge (MBPC 1911:103; MBPC 1913:60). These views are limited by the dense woody vegetation that is currently present.



Figure 53. Observing views from bridle path (location unspecified). Original caption states, “Taking a Look at the City. Glenwood Bridle-path” (MBPC 1913:60).

The vista from Sunset Hill, located northeast of Theodore Wirth Park at the intersection of Theodore Wirth Parkway and 26th Avenue North, was long advocated by Theodore Wirth. However, his vision was never fully realized. Early MBPC annual reports indicate that both the land leading up to Sunset Hill and the western extent of Theodore Wirth Park was intended to be more expansive and allow for a greater linkage between these two resources (Figure 54). Wirth warned in several reports about the pressing need to reserve land in both locations from future development (Figures 55 and 56). However, delays in acquiring this land limited the physical connectivity and extent of views that were later available. While scenic views can still be appreciated from Sunset Hill, Theodore Wirth Park is not within its visual extent.

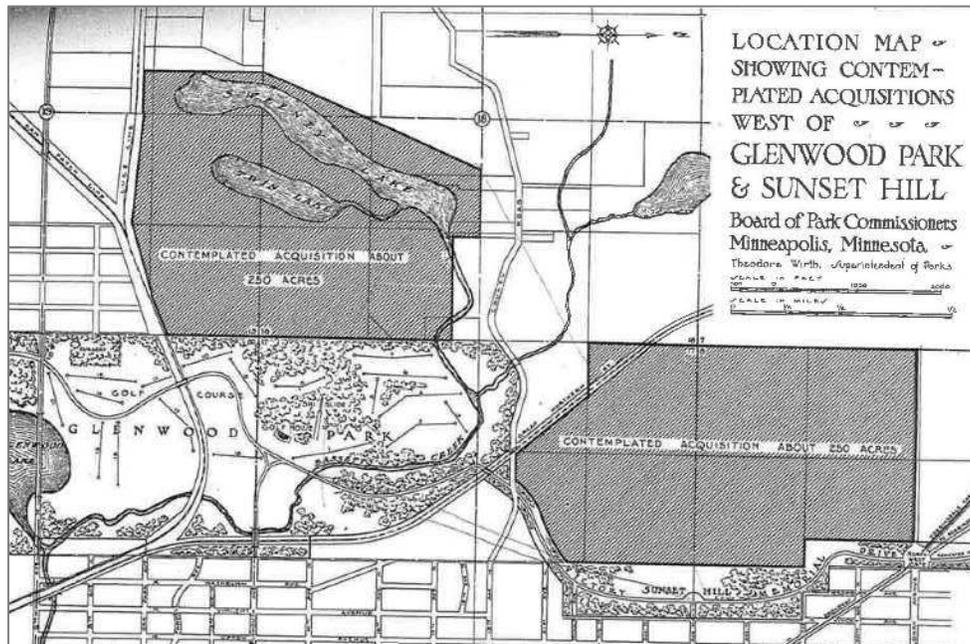


Figure 54. Location Map Showing Platted Acquisitions West of Glenwood Park & Sunset Hill, “contemplated acquisitions” labeled on map include about 250 acres west of the park and about 250 acres west of the parkway at Sunset Hill (MBPC 1923:40).

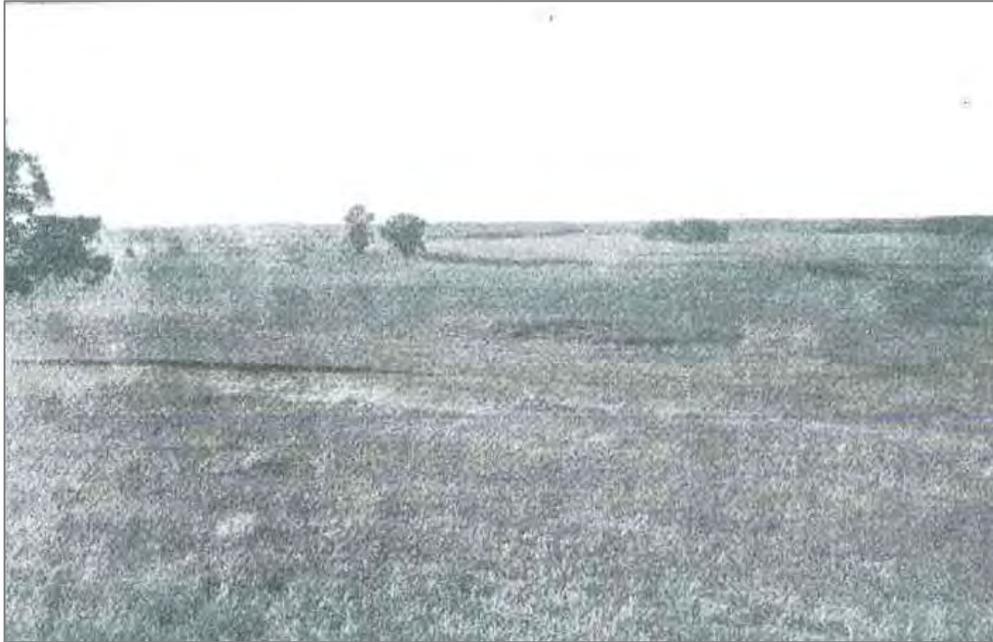


Figure 55. Historic views from Sunset Hill. Original caption states, "The fine view over the open country obtained from Sunset Hill, Victory Memorial Drive, Glenwood-Camden Parkway and 26th Avenue North" (MBPC 1921:78).



Figure 56. Simulation of development impacts on views from Sunset Hill. Original caption states, "The above fine view will be destroyed, if a suburban residential district is permitted to occupy land adjacent to parkway" (MBPC 1921:79).

Several prominent views are located throughout the APE. Hilltop locations within the golf course and winter recreation area afford views of the surrounding rolling topography, woodlands, and Bassett Creek valley. Views and vistas were incorporated into the historic design intent for Theodore Wirth Park. Similar expansive views can be appreciated from high points in the golf course today (Figures 57 and 58).

Expansive views of Wirth Lake can also be appreciated from Picnic Ground No. 4 and from the boardwalk along Highway 55 along the northern edge of the Lake (Figure 59).



Figure 57. Expansive hilltop view in golf course, near the 11th green, facing northeast.



Figure 58. Expansive hilltop view at winter recreation area, north of the Chalet along 10th fairway, facing south.



Figure 59. View of Wirth Lake from Picnic Ground No. 4, facing west.

5.2.6 VEGETATION IN THE APE AND VIEWSHEDS

Soils created by glacial activity supported the establishment of several native plant communities covering the APE and viewsheds, including oak savanna and wet prairie communities (Figure 60). Oak savannas progressed into oak woodlands following European settlement and fire suppression in the area. Oak woodlands largely occupy the steep slopes east of the golf course and partially extend into the un-manicured grounds of the course. Interspersed wide-spreading oak canopies are remnants from the prior savanna community. Patches of second growth forest exist around the lagoons located north of the Luce Line tracks, and in the areas south of Highway 55 and east of Wirth Lake (MPRB 2015:6.7). Wet prairie areas still exist in lower elevations throughout the golf course. As indicated by interpretive signage installed by the MPRB, prairie restoration areas have recently been established at the far northeastern corner of the park, near the intersection of Golden Valley Road and Theodore Wirth Parkway, and near the JD Rivers' Children's Garden located north of Glenwood Avenue. MPRB staff have indicated that the woodland on the western edge of the Osseo Branch Line corridor near the proposed Golden Valley station contains high-quality, old growth oaks (Personal Communication, Bruce Chamberlain, Assistant Superintendent for Planning, MPRB, September 24, 2013). Chestnut trees have also been identified along the slope adjacent to the Osseo Branch Line (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

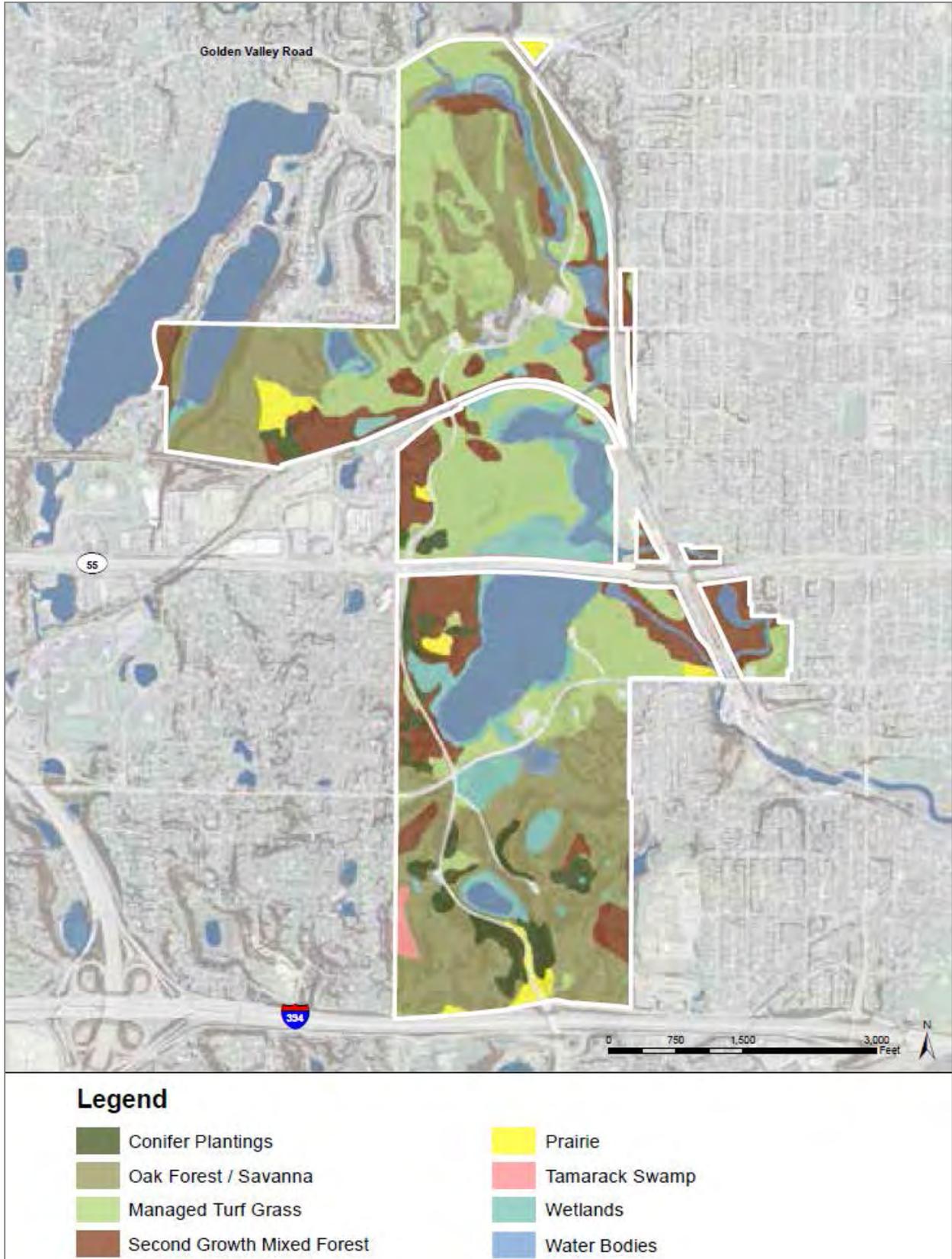


Figure 60. Vegetation Communities in Theodore Wirth Park (MPRB 2015:6.7)

While Wirth remarked positively about the wooded hills of the park, some of his earliest projects consisted of managing density for design and vegetative health reasons. Historical photographs of areas throughout the park generally depict less dense areas of natural vegetation than are present today (Figure 61).



Figure 61. Historic view of golf course showing lower density in trees and sparse undergrowth (MHS 1936).

Evergreen trees and shrubs are a signature design feature of Wirth's original plans. Several groupings exist along the parkway, surrounding the Chalet, throughout the golf course, at Picnic Ground No. 4, and interspersed within the wooded areas near Golden Valley Road. These groupings are composed of many different species and vary in height and density. Overall, the addition of these plantings helped to overcome what Wirth considered a lack of coniferous growth, provide greenery during the winter, create a buffer at park edges (some of these plantings are still evident along the north side of Theodore Wirth Parkway near Golden Valley Road), and create the Alpine design character he envisioned for the park. Over the decades, Wirth gradually transformed the native oak woodlands by adding thousands of evergreens across the entire extent of the park. For the most part, locations and species were not specified. However, the overall transformation is evident in historical plans and photographs (Figures 62-64; also see Figures 6 and 11).



Figure 62. Young evergreen plantings taking root (unknown location in the park) (MHS 1923).



Figure 63. Evergreen plantings on the golf course southeast of the Chalet, facing west.



Figure 64. Evergreen plantings near the winter recreation area (Plymouth Avenue in background), facing southeast.

In addition to evergreen plantings, other vegetative design features include the turf grass for the golf course and picnic areas, and over 5,000 shrubs and 1,000 deciduous tree plantings recorded by Wirth. While the golf course was originally laid out in the late 1910s, it was not sodded until 1935 as part of the Federal Relief work performed by the WPA. Two major losses of vegetation have been documented during the period of significance, including a major windstorm in 1925 impacting 3,200 trees and a prolonged drought in the 1930s impacting many of the oak trees (Pearson 2002). MPRB staff have indicated that WPA reports record large-scale plantings shortly afterwards in 1937, 1940, and 1941 that included trees, evergreens, and shrubs along the parkway and in the Theodore Wirth Golf Course. More recently, MPRB completed substantial replanting following vegetation loss from a tornado that occurred in 2011 (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015).

The JD Rivers' Children's Garden is a recent addition to the park, established in 1982, north of Glenwood Avenue. Prior use of the site commemorating the 100th Anniversary of the Minneapolis Grain Exchange in 1981 set the stage for its development as a youth garden. Wheat and sunflowers were planted as part of the commemoration, which allowed a traditional harvesting demonstration and plant materials for youth programs. J. D. and Ada Rivers promoted the subsequent use of the site as a children's garden. The area contains garden plots for vegetables, herbs, fruit, and flowers that are assigned to youth participating in summer programs (MPRB n.d.). A restored prairie area is also located east of the garden plots and contains interpretive signage about the plant community.

While evergreen plantings are a predominant character-defining feature across the park, the only specific, known areas where historic, pre-1975 plants currently exist, based on previous studies and historical research conducted for this cultural landscape study, are located outside of the APE and viewsheds. Based on comparisons between current and historical aerial photographs, the vegetation in the APE and

viewsheds is currently far more dense and wide-spanning than depicted in historical aerial photographs through 1971 (ASCS 1937; ASCS 1971). Second growth forests and volunteer plants have overtaken much of the land around the lagoons, and the land between Theodore Wirth Parkway and the Osseo Branch Line tracks. The realignment of the intersection between Theodore Wirth Parkway and Plymouth Avenue, the expansion of the parking lot, and the addition of a turn-around in front of the Chalet have altered historic vegetation patterns around the Chalet (ASCS 1971). Deciduous trees at the center of Picnic Ground No. 4 appear consistent with vegetation present in historical photographs. However, on the whole, the vegetation in this area is currently denser and more wide-spread than historic patterns. This change appears to be created by both a larger quantity of plants, and larger sizes of matured plants. Evergreen species that are currently present are not depicted in historical aerial photographs through 1971 (ASCS 1937, 1971). MPRB staff have indicated that the white pines in Picnic Ground No. 4 were planted approximately during the late-1990s to 2000s (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015).

5.2.7 BUILDINGS IN THE APE AND VIEWSHEDS

The Chalet is the only building located in the APE and viewsheds. It is the centerpiece of the golf course and one of the strongest character-defining features in the park reflecting Wirth's original design intent. The exterior of the building retains its original appearance as depicted in early perspective drawings (Figure 65; also see Figure 5). The two-story building is set into the base of a hill, faced in rough-cut Saint Cloud granite and dark-stained clapboards and wood panels, and has a projecting front section set below a broached gable roof with overhanging eaves on large stepped brackets. Gabled wings with overhanging eaves extend on the north and south sides (Pearson 2008h). The Chalet has been previously evaluated and identified as a contributing resource the GRHD (Roise et al. 2012, MPRB 2015).



Figure 65. Theodore Wirth Chalet, facing west.

5.2.8 STRUCTURES IN THE APE AND VIEWSHEDS

Since Bassett Creek and two railroad lines are located within the APE and viewsheds, a total of 15 vehicular and railroad bridges in Study Area are located within the APE. Table 3 below summarizes the bridges located within the APE and viewsheds; each is also discussed separately in the following subsections. Additionally, seven footbridges are located throughout within the APE and viewsheds, including six within Theodore Wirth Golf Course and one over the west/main channel of Bassett Creek south of Hwy 55 (see Table 4).

Table 3. Bridges Located within the APE and Viewsheds

Inventory No.	Bridge No.	Location	Contributing/ Non-Contributing (C/NC)	Individual NRHP- Eligibility
ROAD-RELATED BRIDGES				
HE-GVC-00049	6247	Plymouth Avenue over Osseo Branch Line	NC (based on 2013 re-evaluation)	Not Eligible
HE-GVC-00050	L9327	Theodore Wirth Parkway over Bassett Creek	C	Eligible
HE-GVC-00091	27678	Theodore Wirth Parkway over Osseo Branch Line Tracks near Golden Valley Road	NC	Not Previously Determined
HE-MPC-01907	27607	Glenwood Avenue over Bassett Creek, Osseo Branch Line and Luce Line	NC	Not Previously Determined
HE-MPC-5287	27237	Highway 55 over Bassett Creek, Osseo Branch Line and Luce Line	Not Previously Determined	Not Eligible
HE-GVC-00056	5908	Highway 55 over Bassett Creek	NC	Not Previously Determined
HE-MPC-5288	Not Available	Highway 55 over East Channel of Bassett Creek	Not Previously Determined	Not Eligible
Not Available	27591	Golden Valley Road over Osseo Branch Line	Not Previously Determined	Not Previously Determined
Not Available	Not Available	Golden Valley Road over Bassett Creek (culvert)	Not Previously Determined	Not Previously Determined
RAILROAD-RELATED BRIDGES				
HE-GVC-376	Not Available	Luce Line Trestle over Bassett Creek	Not Previously Determined	Not Eligible
HE-MPC-5285	Not Available	Luce Line Bridge over Bassett Creek	Not Previously Determined	Not Eligible

Inventory No.	Bridge No.	Location	Contributing/ Non-Contributing (C/NC)	Individual NRHP- Eligibility
HE-MPC-5286	1.7	Osseo Branch Line over east channel of Bassett Creek	Not Previously Determined	Not Eligible
Not Available	Not Available	Osseo Branch Line over Bassett Creek (culvert east of Chalet)	Not Previously Determined	Not Previously Determined
Not Available	1.4	Osseo Branch Line over East Branch of Bassett Creek (south of Highway 55)	Not Previously Determined	Not Previously Determined
Not Available	Not Available	Osseo Branch Line over Bassett Creek Lagoons (culvert north of Plymouth Ave)	Not Previously Determined	Not Previously Determined

5.2.8.1 Bridge No. 6247

The Plymouth Avenue Bridge (Bridge 6247; HE-MPC-0049; non-contributing to the GRHD; not eligible for individual NRHP listing) was constructed in 1930 to replace a timber pile bridge required to extend Plymouth Avenue into the park (Figure 66). The six-span, reinforced-concrete slab bridge was substantially renovated in 2006 but still retains its distinctive arched concrete piers. The bridge appears similar at track level and from the Bassett Creek Trail as seen in historical photographs after its construction (Figure 67). Concrete embankments were added shortly afterwards in 1933 to prevent continued settling of the fill (MBPC 1934:66). However, from road grade the historical integrity of the bridge has been substantially compromised by the modern deck, railing, and light fixtures. Bridge 6247 was previously determined eligible for the NRHP under Criterion C for its design and identified as a contributing feature to the GRHD. However, this determination was later reversed after the 2006 renovation due to a loss of design integrity (MnDOT 2013). Bridge No. 6247 and the broader route of Plymouth Avenue are discussed further under Section 5.4 Contributing Features in the APE and Viewsheds.

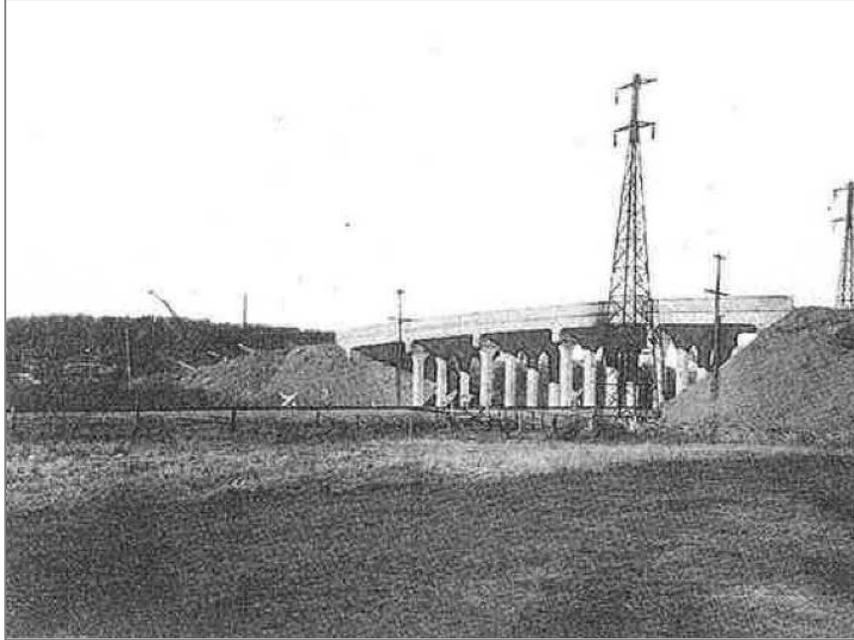


Figure 66. Historic view of Bridge 6247 after its construction in 1930 (MBPC 1931:100).



Figure 67. Current view of Bridge 6247 (Plymouth Avenue over Osseo Branch Line tracks and Bassett Creek), facing north.

5.2.8.2 Bridge No. L9327

Bridge L9327 (HE-GVC-00050; contributing to the GRHD; individually NRHP-eligible) was constructed in 1940 with WPA labor using similar stone facing to the Chalet to replace an unsightly concrete and steel bridge crossing Bassett Creek. The arched, ridged-frame, concrete culvert bridge has an eighteen-foot span and is faced in Saint Cloud seam-faced granite. The barrel arch measures fifty feet wide. The abutments are monolithic and U-shaped. Stone piers with stone copings form the railings (Pearson 2008c) (Figure 68). The bridge carries two lanes of vehicular traffic bracketed with sidewalks on each side; however, only the west sidewalk is connected to the current trail system. Bridge L9327 has been determined eligible for the NRHP under Criterion C as an excellent example of an ornamental park bridge (Hess n.d.). This bridge has been previously evaluated and determined as a contributing resource to the GRHD (Roise et al. 2012, MPRB 2015). Cobblestone riprap was added to the abutments in 2014-15 as part of an erosion repair project (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).



Figure 68. Bridge L9327 (Theodore Wirth Parkway over Bassett Creek), facing northwest.

5.2.8.3 Bridge No. 27678

Theodore Wirth Parkway is bridged at one other location within the APE near Golden Valley Road (Bridge 27678 [HE-GVC-00091; non-contributing to the GRHD; individual NRHP-eligibility not previously determined]) where it crosses over the Osseo Branch Line tracks. This four-span concrete, curved structure was built between 1988 and 1991 (Figure 69). The deck is edged by a metal picket railing. The straight wing walls are faced with granite and the two piers have concrete columns (Pearson 2008n). The contemporary bridge design does not reference historic features in the park (Roise et al. 2012, MPRB 2014).



Figure 69. Bridge 27678, facing southeast.

5.2.8.4 Bridge No. 27607

Bridge 27607 (HE-GVC-01907; non-contributing to the GRHD; individual NRHP-eligibility not previously determined) carries Glenwood Avenue over the Osseo Branch Line and Luce Line tracks (Figure 70). The five-span, pre-cast concrete channel-beam structure was built in 1982. Two concrete piers with cylindrical concrete columns support the concrete deck. The deck carries two lanes of vehicular traffic and sidewalks on both sides of the roadway. Low concrete parapets topped by modern metal poles form the railings (Atwood 2009c) (Roise et al. 2012, MPRB 2014).



Figure 70. Bridge 27607, facing southeast.

5.2.8.5 **Bridge No. 5908**

Bridge 5908 (HE-GVC-00056; not contributing to the GRHD; individual NRHP-eligibility not previously determined), constructed in 1947 and altered in 1988, carries Highway 55 over Bassett Creek (Figure 71). It is composed of a two-span concrete box culvert with exterior cell walls that form the wing walls projecting into the lagoon. The culverts allow water flow between Wirth Lake to the west and Bassett Creek via the lagoon located to the south of this structure. An additional small, stone culvert serves as an outlet for Wirth Lake into the lagoon (Figure 72) (Roise et al. 2012, MPRB 2015).



Figure 71. Current view of Bridge 5908, facing north.



Figure 72. Stone culvert between Wirth Lake and Bassett Creek, facing northwest.

5.2.8.6 Highway 55 over East Channel of Bassett Creek

The Highway 55 Bridge over the East Channel of Bassett Creek (HE-MPC-5288; not previously determined as contributing or non-contributing to the GRHD; individually not eligible for NRHP listing), constructed ca. 1920, is only partially visible and has been covered by fill for Highway 55 construction. The visible portion on the north side consists of a rock face ashlar stone wall, corrugated circular metal pipe covered by a metal grate, and limestone wingwalls at each end of the ashlar wall. Portions of the ashlar wall are covered by a concrete parge coat. There is no visible culvert entering Bassett Creek on the south side (Figure 73).



Figure 73. Highway 55 over East Channel of Bassett Creek (facing southeast).

5.2.8.7 Bridge No. 27237

Bridge 27237 (HE-MPC-5287; non-contributing feature to the GRHD; individually not-eligible for NRHP listing), constructed in 1984, carries Highway 55 over the Osseo Branch Line and Luce Line railroad tracks. This continuous reinforced concrete slab bridge was constructed in 1984 as a replacement to an earlier structure during a major highway rebuilding (Figure 74).



Figure 74. Bridge 27237, facing northeast.

5.2.8.8 Bridge No. 27591

Bridge 27591 (not previously inventoried or evaluated) was recently constructed in 2001, replacing an earlier bridge carrying Golden Valley Road over the Osseo Branch Line railroad tracks (National Bridges 2015) (Figure 75). This bridge is a three-span, pre-stressed concrete stringer deck bridge.



Figure 75. Bridge 27591, facing northeast.

5.2.8.9 Golden Valley Road over Bassett Creek

A large, metal culvert (not previously inventoried or evaluated) carries Golden Valley Road over Bassett Creek. It is set into a low concrete face wall that is surrounded by stone riprap on the eastern and western banks of the river (Figure 76). This culvert appears to date to approximately 1957 based on historic aerial photographs (ASCS 1957).



Figure 76. Culvert at Golden Valley Road, facing north.

5.2.8.10 Luce Line Bridges over Bassett Creek

The Luce Line Trestle over Bassett Creek (HE-GVC-376; not previously determined as a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing) is located in the golf course, south of Plymouth Avenue. During field survey, it was found that the wooden trestle bridge was substantially altered in 2013 (106 Group 2012b). The original five-span bridge now only has three spans. The superstructure has been replaced with a metal girder, two of the wooden bents have been removed and the other two have been reinforced with concrete, and the wooden abutments have been replaced with concrete (Figure 77). Cobblestone riprap was placed along the creek banks under the bridge in 2014-15 (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).



Figure 77. Current view of Luce Line Trestle over Bassett Creek, facing east.

The Luce Line Bridge over Bassett Creek (HE-MPC-5285; not previously determined as a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing) is only a partially visible structure that has been covered with fill. This bridge carries the Luce Line over the main channel and east channel of Bassett Creek (Figure 78, foreground). Much of the original creek channel has been in filled. The Luce Line over Bassett Creek bridge currently appears to only consist of a corrugated metal culvert (replaced in 2009) that passes under the stone ballast on the east side of the tracks (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).



Figure 78. Luce Line over Bassett Creek (foreground) and Bridge 1.7 (background), facing southeast.

5.2.8.11 Osseo Branch Line Bridges and Culverts

Bridge 1.7 (HE-GVC-5286; not previously determined a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing) is a four-span, 16-foot concrete slab bridge with reinforced concrete abutments and angled wing walls carrying the Osseo Branch Line over Bassett Creek. Two corrugated steel pipe culverts are also located under the bridge and secured by ballast fill (see Figure 78, background). It is also only partially visible and has been covered with fill for Bassett Creek.

Additionally, a concrete box culvert surrounded by a limestone wall (not previously inventoried or evaluated) is located west of the Osseo Branch Line tracks and north of Plymouth Avenue. It appears to carry the Osseo Branch Line and an adjacent trail to the west over the Bassett Creek Lagoons. This structure appears to date to approximately 1945 based on historical aerial photographs (Figure 79) (ASCS 1945).



Figure 79. Concrete box and stone wall culvert north of Plymouth Avenue, facing east.

North of Glenwood Avenue, Bridge 1.4 (not previously inventoried or evaluated) carries the Osseo Branch Line over the eastern branch of Bassett Creek (Figure 80). It is a double concrete culvert/pipe structure dating to 1943 (106 Group 2012c).



Figure 80. Osseo Branch Line Bridge 1.4, facing east.

A metal pipe culvert (not previously inventoried or evaluated) is located immediately north of Bridge 6247 at Plymouth Avenue that carries the Osseo Branch Line over Bassett Creek (Figure 81).



Figure 81. Metal pipe culvert north of Plymouth Avenue, facing east.

5.2.8.12 Footbridges

A total of seven footbridges are located in the APE and viewsheds, including six footbridges located throughout Theodore Wirth Golf Course and one footbridge located east of Picnic Ground No. 4. Table 4 summarizes these bridges according to their location, span type, and materials. None of these bridges have been previously inventoried or evaluated as contributing or non-contributing resources, or as individual resources. All of the creek bridges had cobblestone riprap placed under them in 2014-15 (Personal Communication, Andrea Weber, Project Manager, MPRB, July 7, 2015).

Table 4. Footbridges in the APE and Viewsheds

Location	Span Type (Arched/Flat)	Materials
12 th Fairway (NW; 1 of 2 in pair)	Flat	Wood, Metal & Concrete
12 th Fairway (SE; 2 of 2 in pair)	Arched	Wood
11 th Green	Arched	Wood
Chalet	Arched	Wood
1 st Fairway	Arched	Wood & Metal
2 nd Fairway	Flat	Wood, Metal & Concrete
East of Picnic Ground No. 4	Arched	Wood & Metal

These arched and flat single-span bridges carry pathways across Bassett Creek and Theodore Wirth Parkway. Three of the six bridges in the golf course are fully constructed of wood, while the others are constructed in combinations of wood, metal, and concrete (Figures 82 and 83). The bridge crossing Theodore Wirth Parkway south of the Chalet was recommended in Eckbo's 1971 plan, although it does not appear in aerial photographs until 1991 (Eckbo et. el. 1971:3.73-3.74) (Figure 84). A pair of footbridges is located at the far northwestern section of the golf course; the southeast bridge of this pair is wider, more contemporary, and appears to be added as a more suitable structure for golf carts. The footbridge located outside of the golf course at the east channel of Bassett Creek is constructed in a combination of wood and metal.



Figure 82. Example of wood and metal footbridge at the east of Picnic Ground No. 4, facing southeast.



Figure 83. Example of concrete, wood and metal footbridge at Theodore Wirth Golf Course, facing northwest.



Figure 84. Footbridge over Theodore Wirth Parkway, facing southeast.

Other structures present within the APE include a boat launch (currently closed and planned to be removed in the future), fishing dock, and boardwalk at Wirth Lake. The boat launch area is an asphalt apron, accessed through a parking lot at Picnic Ground No. 4, and is marked with metal posts, chains, and signage (Figure 85). The fishing dock is a moveable, T-shaped structure with a wood board deck and wood railings (Figure 86). The boardwalk at Wirth Lake is a linear, metal structure that runs parallel to Highway 55 and has two covered rest areas with benches (Figure 87). Wooden stairs have also been set into the slopes of the golf course at two locations (along the 12th fairway, and the 9th fairway adjacent to the footbridge over Theodore Wirth Parkway). Concrete and wooden stairs lead from the Chalet up the hillside to the winter recreation and maintenance areas (Figure 88).



Figure 85. Boat launch area, facing west (the boat launch is currently closed).



Figure 86. View to fishing dock, facing south.



Figure 87. Boardwalk, facing east.



Figure 88. Concrete and wood stairs at Chalet, facing southwest.

5.2.9 SITE FURNISHINGS AND SMALL SCALE ELEMENTS IN THE APE AND VIEWSHEDS

A variety of small-scale features are present within the APE and viewsheds, including fences and bollards, furnishings, memorials, winter recreation equipment, utilities, lighting, and signage. According to NRHP guidelines for counting features as contributing or non-contributing, some of these small-scale elements have not been previously evaluated as part of the draft NRHP nomination for the GRHD. However, many are discussed in the draft NRHP nomination. Where available, the status for the currently-documented period of significance (through 1942) is noted. The potential for contributing features between 1942 and 1975 is also discussed below.

5.2.9.1 Fences & Bollards

As a public park, most of the borders in Theodore Wirth Park are unfenced, except for golf course areas on the northern edge of the park. These areas are fenced off with a chain link fence from adjacent unpaved trails and adjacent residential development. A contemporary black metal picket fence runs along portions of Theodore Wirth Parkway north of Bridge L9327 (Figure 89). Wooden split rail fencing is also located along a portion of the parkway, roughly between the Chalet and Tool Building, and along the southern edge of Glenwood Avenue (Figure 90). Based on its materials and design, the fence appears to post-date 1975. MPRB staff have indicated that current fencing along Theodore Wirth Parkway was installed more recently, and outside of the potential extended period of significance (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). These features have not been previously evaluated, but appear to post-date the potential extended period of significance to 1975 and therefore do not appear to be contributing features.



Figure 89. Metal fencing along Theodore Wirth Parkway at higher elevations north of Bridge L9327, facing southwest.



Figure 90. Wooden split rail fencing along Theodore Wirth Parkway, south of the Chalet near the 18th green, facing southwest.

5.2.9.2 Benches

Numerous benches are located throughout the golf course and near the Chalet. Additional benches are located along pathways throughout the park. Three principal style variations exist: wood planks supported by metal posts; wood slats set into exposed-aggregate concrete supports; and wooden bench seats without back supports. While the draft NRHP nomination discusses benches, none of these benches have been previously evaluated or determined as contributing features to the GRHD.

The wooden plank and metal post benches are very basic and utilitarian in appearance, with some variations among the form and color of supports. Based on their materials and design, these benches appear to post-date 1975. This style exists throughout the golf course at the start of each hole, and along paved paths south of Highway 55. Several of these benches are also located in front of the Chalet (Figure 91). The benches include single- and double-seat forms. MPRB staff have indicated that the benches located in Theodore Wirth Park are typically added during construction projects, and that the front-nine portion of the golf course was recently rehabilitated in 1992 (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). More substantial wooden slat and exposed aggregate concrete benches exist near the footbridge southeast of the Chalet and in Picnic Ground No. 4 (Figure 92). These also include single- and double-seat forms. This style was first introduced in the 1930s and is still in production (Pearson 2002:16). They can be found throughout the parkway system. Based on the color of the concrete and wood, the single-seat bench near the Chalet appears to be more recent while the double-seat bench facing Plymouth Avenue appears to be older and potentially pre-dates 1975. The single-seat form in Picnic Ground No. 4 appears to post-date 1975. The bench at Plymouth Avenue appears to be a contributing feature (see Figure 30A). The all-wooden benches with no back supports are notably more blocky and darker in color than other benches. Several of these benches are surrounded by bollard and chain fencing reflective of the 1970s period and appear to be contributing features (Figure

93). This bench style is only located in front of the Chalet; however, it mimics the set of picnic benches located east of Bridge L9327 (described below). These furnishings were not specified in the Eckbo Plan, although they appear similar to the fencing developed by InterDesign in the 1970s. MPRB staff are not aware of any benches that were designed by Alfred French (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). These benches also have not been indicated as the work of InterDesign or Alfred French in previous studies (Roise et al. 2012, Pearson 2002, Mathis 2014).



Figure 91. Example utilitarian bench style in front of the Chalet, typical throughout the golf course, facing northwest.



Figure 92. Example wooden slat and exposed-aggregate concrete bench at Picnic Ground No. 4, facing north.



Figure 93. 1970s-style seating area with bollard-and-chain surround at the Chalet, facing south.

5.2.9.3 Picnic Tables & Other Furnishings

Picnic tables are located in five areas within the APE: in front of the Chalet; east of Bridge L9327; at the archery range; at Picnic Ground No. 4; and near the JD Rivers' Children's Garden (see Figure 30A and 30B). Several design variations exist as described below. The WPA benches and 1970s-era wood benches appear to date within the extended period of significance, while the other variations appear to post-date

1975. None of the picnic tables have been previously evaluated and determined as contributing features to the GRHD.

Circular, green metal tables with four seats, and hexagonal tables with six seats, are located in front of the Chalet (Figures 94 and 95). The hexagonal set appears to be formed by composite materials giving the appearance of wood with metal supports. Based on their design and materials, these picnic tables appear to post-date 1975. MPRB staff have indicated these two styles are more recent and date to the reconstruction of the parking and re-alignment of Theodore Wirth Parkway, which occurred roughly between 1969 and 1979 (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). The WPA constructed concrete picnic tables in Picnic Grounds No. 4 (Figure 96). These tables are stamped with “WPA 1939” on the seats. While the WPA picnic tables have not previously been determined as contributing resources to the GRHD, it appears that they have potential as contributing features as discussed further under Section 5.4 Contributing Features in the APE and Viewsheds. Rectangular wooden picnic tables with rounded metal supports are located east of Bridge L9327, at the archery range, and in Picnic Ground No. 4 and near JD Rivers’ Children’s Garden (Figure 97). This style dates to the 1970s (Pearson 2002:16). All-wooden, rectangular picnic tables are located west of the JD Rivers’ Children’s Garden and east of the archery range and appear to post-date 1975 (Figure 98). MPRB staff have indicated that this style is more recent, dating approximately to when the garden was developed between 1981 and 1982 (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). MPRB staff have also indicated these benches are from inside of the Picnic Pavilion and are not intended as landscape furnishings (Personal Communication, Andrea Weber, Project Manager, MPRB, July 9, 2015). The all wooden tables located east of Bridge L9327 are notably more blocky and darker in color than others in the APE (Figure 99). They are similar in style to the benches located southeast of the Chalet with a bollard-and-chain surround. These tables were not specified in the Eckbo Plan in concept or as a design typology, but appear to have been installed concurrently with improvements from the plan. MPRB staff are not aware of any picnic tables that were designed by Alfred French (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). These picnic tables have also not been indicated as the work of InterDesign or Alfred French in previous studies (Roise et al. 2012, Pearson 2002, Mathis 2014).



Figure 94. Circular, green metal picnic tables at Chalet, facing north.



Figure 95. Hexagonal, composite material picnic tables at Chalet, facing southwest.



Figure 96. WPA tables benches at Picnic Ground No. 4, facing southwest.



Figure 97. Example wooded picnic table with rounded metal supports, facing west.



Figure 98. Example all-wooden rectangular picnic tables (note these belong inside of the Picnic Pavilion and are not intended as a landscape furnishing), facing northeast.



Figure 99. 1970s-style picnic tables located east of Chalet, facing east (note similarities to benches at Chalet).

Other furnishings in Picnic Ground No. 4 include trash cans, signage, grills, a water pump, and a WPA concrete sandbox. The WPA also built a low stone wall surrounding the water pump that is set within a hillside slope located east of the parking lot. Several metal grills and trash cans are located throughout the grounds that appear to post-date 1975 based on their materials and design. The JD Rivers' Children's

Garden features a variety of furnishings, including pergolas and other structures to support plant cultivation, numerous garden ornaments, and community art projects (Figure 100). The JD Rivers' Children's Garden was developed in 1982, and therefore, its features post-date 1975 and would not be contributing features to the GRHD.



Figure 100. JD Rivers' Children's Garden, facing northeast.

5.2.9.4 Memorials

The Finnish-American Monument (HE-GVC-00095; non-contributing but subject to review if period of significance is extended; individual NRHP eligibility not previously determined), constructed to commemorate the large Finnish community traditionally located in the Harrison Neighborhood, is located at the center of Picnic Ground No. 4 (Figure 101). The large, rectangular, granite slab monument, constructed in 1958, features a map of Finland on the west side and a map of Minnesota on the east side (Pearson 2008i). The Theodore Wirth Interpretive Statue Garden (HE-GVC-00098; non-contributing to the GRHD; not previously evaluated for NRHP eligibility) is a modern addition in front of the Chalet (Figure 102). The group of six, life-size statues was constructed in 2004. It features Theodore Wirth surrounded by children playing. Sculptor Bill Rains designed the statues using his grandchildren as models (Pearson 2008h).



Figure 101. Finnish-American Monument, facing southeast.



Figure 102. Theodore Wirth Interpretive Statue Garden at the Chalet, facing southwest.

The Finnish-American Monument has been previously evaluated and determined as non-contributing, which is likely due to its age that falls outside of the currently documented period of significance in the draft NRHP nomination ending in 1942 (Roise et al. 2012, MPRB 2014). Under the extended period of significance, it appears this feature has potential as a contributing feature as discussed further under Section 5.4 Contributing Features in the APE and Viewsheds.

5.2.9.5 Equipment & Utilities

Two large terminals and bullwheels for a tow rope are located on the 10th fairway of the 18-hole golf course north of the Chalet, supporting winter recreation activities (Figure 103). The drive bullwheel with the power source is located at the bottom of the hill and the return bullwheel is located at the top. This feature appears to post-date 1975 and therefore, appears to be non-contributing to the GRHD.



Figure 103. Tow rope anchors at winter recreation area, facing northwest.

Metal and exposed-aggregate concrete trash cans are located around the Chalet and throughout Picnic Ground No. 4 (Figures 104 and 105). Additionally, round wire-mesh trash cans are located adjacent to benches in front of the Chalet and throughout the golf course (Figure 106). MPRB staff have indicated that the trashcans present across Theodore Wirth Park are moveable and ubiquitous through the entire Minneapolis park system (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). The metal trash cans do not readily appear to date within the extended period of significance (through 1975); however, the exposed-aggregate style on the Chalet patio does appear to date roughly within the 1970s based on its design and materials.

Figure 104. Example of metal trash can at the Chalet, facing west.



Figure 105. Example of metal trash can at the Chalet, facing west.



Figure 106. Example of exposed aggregate trash can at the Chalet, facing northeast.



Figure 107. Example of wire mesh trash can on Theodore Wirth Golf Course, facing west.

Various utility posts, structures, and boxes are located throughout the APE and viewsheds. These features appear to post-date 1975. A double circuit high voltage transmission line (HVTL) is the most prominent utility structure. The double circuit HVTL originates from the Aldrich Substation in Minneapolis and splits roughly at Farwell Avenue, where one circuit continues in a generally north-northwesterly direction paralleling the Osseo Branch Line to the Indiana Substation in Robbinsdale (HE-TRL-001; not previously determined a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing), and the other circuit extends in a generally westerly direction roughly paralleling the Luce Line to the Bassett Creek Substation in Plymouth (not previously evaluated) (Figure 107) (Minnesota Geospatial Information Office 2008). A ca. 1950 Xcel Energy high voltage transmission line (HVTL) (HE-TRL-001; not previously determined a contributing or non-contributing feature to the GRHD; not eligible for individual NRHP listing) is the most prominent utility structure (Figure 107). The infrastructure is located on the west side of the Osseo Branch Line railroad corridor to Lowry Avenue, and the east side of freight rail corridor south of Lowry Avenue (FTA 2014:251). The HVTL is comprised of three transmission wires and support tower structures that are spaced at approximately 350 foot intervals. The towers are constructed of bolted angle iron and rest on concrete piers. They have four legs with angle iron lateral and cross braces. The towers are comprised of seven panels surmounted by gusset plates on all sides where the legs meet. Above the gusset plates is a steel truss. There is a ladder comprised of bolts on the northwest leg of the tower. The structures have two simple truss cross arms that support the wires using ceramic insulators. One cross arm is mounted just above the gusset plates and the other is near the top of the tower (Kellerhals et al. 2012:51; 106 Group 2012e).



Figure 108. Visibility of Xcel Energy transmission line infrastructure at Theodore Wirth Golf Course, facing south.

5.2.9.6 Lighting

Lighting was first implemented throughout Theodore Wirth Park and Theodore Wirth Parkway roughly between 1910 when the city began experimenting with gas lights and 1933 when the old standards were replaced with electric lights (Pearson 2002:16). The Eckbo plan called for a comprehensive guide and master plan to guide the selection of lighting fixtures and their placement (Eckbo et al. 1971:6.05). The transparent cube standard was designed by Alfred French of InterDesign (Pearson 2002:7.11). These standards were installed throughout the Grand Rounds as part of implementing the Eckbo Plan. Within the APE and viewsheds, these lighting standards are located in the parking lot of the Chalet (Figure 108). Additional large-scale, utilitarian standards consisting of floodlights mounted on wooden posts are located throughout the winter recreation area (Figure 109). Contemporary fixtures were mounted onto the Plymouth Avenue bridge after its remodel in 2006 (Bridge 6247) (Figure 110). Other contemporary fixtures were installed as replacements along the parkways and reflect earlier styles (Figure 111). These were installed throughout the parkway in the early-2000s as replacements to the cube standards, which were difficult to maintain (Roise et al. 2012). The new standards are characterized by a tall, fluted standard with a curved cross-arm supporting a bell-shaped cover.



Figure 109. Example of 1970s post and cube light standard at the Chalet parking lot, facing west.

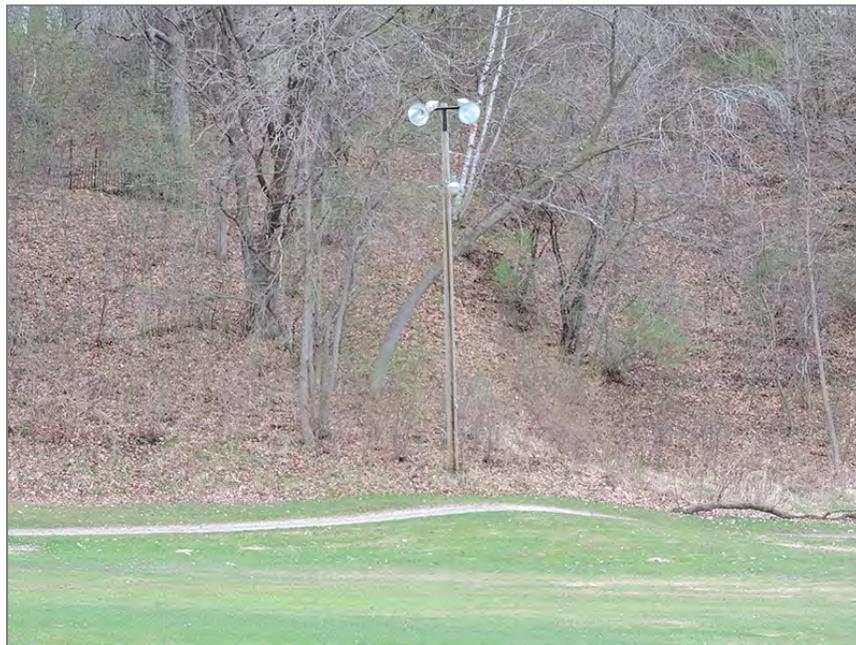


Figure 110. Example of large-scale, utilitarian lighting at winter recreation area, facing west.



Figure 111. Contemporary light standards on Bridge 6247, facing north.



Figure 112. Example of contemporary light standard reflective of 1930s ornamental style along Theodore Wirth Parkway, facing northwest.

5.2.9.7 Signage

Standard traffic signs, wayfinding and other signage are located throughout the APE and viewsheds (Figure 112). Wayfinding signage was introduced in the Grand Rounds as part of the Eckbo Plan, and later replaced by an updated signage program in 1999 when MPRB adopted the *Grand Rounds Scenic Byway Interpretive Master Plan* (Mathis 2014:68). While some of the original 1970s elements exist in Theodore Wirth Park, none are present within the APE and viewsheds. The signage program from 1999 included horizontal wood identification signs, wood-frame information kiosks, and painted metal information signposts at major intersections (Roise et al. 2012). Similar aesthetics were used in the kiosks and entrance signs to the parks and parkways between the 1970s-era design by Peter Seitz and the 1999 Scenic Byway Program. These similarities include the low, rustic, routed horizontal wood forms on the entrance signs, and the overall shape and scale of the kiosks. Changes appearing in the 1999 design include the addition of color along the roofline of pyramidal kiosks, and the addition of the address, interpretive panels, and maps. The text style of lettering also appears different between the 1970s version, which is taller, more angular and in all capital letters, and the 1999 version, which is shorter, more rounded, and includes lower-case lettering. None of the earlier 1970s signs were found in the APE and viewsheds during field survey.

Various other signage is located throughout the APE and viewsheds. An oblong metal sign marks the entrance to Picnic Grounds No. 4 (Figure 113). MPRB staff have indicated that this entrance sign appears to date to approximately the timeframe of WPA improvements (ca. 1938 to 1941) (Personal Communication, Adam Arvidson, Interim Director of Strategic Planning, MPRB, July 1, 2015). This sign appears to be contributing to the GRHD. Large-scale, wood signs mark the entrances to Theodore Wirth Park and the JD Rivers' Children's Garden on Glenwood Avenue; and Theodore Wirth Parkway at the intersection of Plymouth Avenue and the parkway (Figures 114 and 115). A large-scale, metal sign marks the entrance to the Theodore Wirth Golf Course at the Chalet (Figure 116). A small, metal sign is posted below a stop sign marking the Grand Rounds Scenic Byway at the intersection of Golden Valley Road and the parkway (Figure 117). Interpretive signage is also located at both prairie restoration areas within the APE (Figure 118). Aside from the signage at Picnic Ground No. 4, none of the other signage in the APE and viewsheds appears to date within the potential extended period of significance, and therefore, does not appear to be contributing features to the GRHD.



Figure 113. Example kiosk north of Bridge L9327 along Theodore Wirth Parkway and Bassett Creek, facing northwest.



Figure 114. Entrance Signage for Picnic Ground No. 4, facing northwest.



Figure 115. Entrance Signage for Theodore Wirth Park at Glenwood Avenue, facing west.



Figure 116. Entrance signage for JD Rivers' Children's Garden, facing northeast.



Figure 119. Example interpretive signage at prairie restoration area north of Glenwood Avenue, facing south.

5.2.10 ARCHAEOLOGICAL RESOURCES IN THE APE AND VIEWSHEDS

One archaeological site is located within the APE representing the Germania Brewery (21-HE-0407; contributing status to the GRHD undetermined; individually NRHP-eligible) [REDACTED]. Theodore Wirth considered this feature undesirable for the park, and it was soon redeveloped once the land was acquired for park use (Wirth 2006:174). The Germania Brewery does not have a direct relationship to park planning and development, or the GRHD. It has not been previously evaluated or determined as a contributing resource to the GRHD. However, it has been previously determined eligible for the NRHP (Vermeer 2012).

5.3 Overall Integrity

The NPS guidelines define the integrity of cultural landscapes as the degree, on whole, to which the character-defining features that convey its historical significance are still present (NPS 2009:71). Since landscapes are dynamic spaces, change and evolution are integral to those resources. Therefore, integrity depends on the extent to which the general character of the historic period is evident, and the degree to which incompatible elements impact that character and are reversible. When the integrity of a specific feature may impact its status as a contributing feature, those conditions are specified in the sections below.

The integrity of the park, as a whole, has been previously documented by Hess, Roise and Company as part of the Grand Rounds NRHP draft nomination in 2012. Theodore Wirth Park and Theodore Wirth Parkway were found to retain their historic form and character. They were also found to retain good

integrity of location, design, setting, feeling, and association (Roise et al. 2012:7.52-7.53). Survey work for the BLRT project confirmed those conditions are still current, on whole.

5.4 Contributing Features in the APE and Viewsheds

Contributing and non-contributing features in Theodore Wirth Park have been previously inventoried as part of the draft NRHP nomination for the GRHD during the period of significance that is currently documented (1887-1942). The district is in the process of being evaluated by the MnSHPO and MPRB to determine if it possesses potential significance within the period of 1943 to the mid-1970s, related to improvements made in accordance with the 1971 Eckbo Plan. Character-defining features that date, or appear to date within the potential extended period of significance through 1975 are also discussed in this section. The draft NRHP nomination for the GRHD states that major resources are included in the count of contributing and noncontributing resources, and that the district also includes numerous minor features and small-scale elements (i.e., signage and lighting) that are not counted as separate resources but mentioned in the nomination (Roise et al. 2012:7.1). Minor features and small-scale elements are also addressed below as to whether they appear to contribute to the areas of significance for the GRHD. Additionally, this study documents larger landscape features, such as topography, views and vistas, and vegetation, that were not previously inventoried as part of the draft NRHP nomination but are character-defining features of the cultural landscape of Theodore Wirth Park.

In addition to the draft NRHP nomination, the 2015 Master Plan provides a cultural resources inventory that lists “potentially contributing” features that were built during the period of significance (1884-1942) and are “intact” from that period (MPRB 2015:5.5). The 2015 Master Plan also inventories post-1942 features. While these features are indicated as not “potentially contributing” in the 2015 Master Plan under the currently-documented period of significance, they are subject to review within the potential extended period of significance. The 2015 Master Plan states that an official determination of contributing features in Theodore Wirth Park had not been completed at the time the plan was published (MPRB 2014:5.5). This is likely due to the ongoing consultation between MnSHPO and MPRB as part of updating the draft NRHP nomination.

Most of the “potentially contributing” features inventoried in the 2015 Master Plan (13 out of 15) that are located within the APE and viewsheds are the same as those listed in the draft NRHP nomination. The 2015 Master Plan includes the following two additional features located within the APE and viewsheds: winter recreation area, an additional land use within the Theodore Wirth Golf Course; and Germania Brewery, an archaeological site. These features are discussed further in the sections below. Additionally, the 2015 Master Plan identifies Bridge 6247 at Plymouth Avenue as not “potentially contributing,” while the draft NRHP nomination lists it as contributing. This is due to a subsequent re-evaluation of Bridge 6247 in 2013, which is discussed further under Section 5.4.1.2.

5.4.1 CONTRIBUTING FEATURES IN THE APE AND VIEWSHEDS (PRE-1942 PERIOD OF SIGNIFICANCE)

The draft NRHP nomination lists a total of 30 contributing and non-contributing features to the GRHD within Theodore Wirth Park (Roise et al. 2012). Of these 30 total features, eight features identified as contributing are located within the APE and viewsheds for the BLRT project; however, one of these features (the Plymouth Avenue Bridge/Bridge 6247) has been subsequently evaluated and found to be non-contributing to the GRHD (see Section 5.4.1.2). These contributing resources reflect the currently documented period of significance (1887-1942), rather than the potential extended period through the mid-1970s that is under discussion. Table 5 below summarizes the contributing features identified in the draft NRHP nomination under the currently documented period of significance that are located within the APE and viewsheds (Figure 119A and 119B).

Table 5. Contributing Features from the Draft NRHP Nomination in the APE and Viewsheds (for the period of significance documented as 1884-1942)

Inventory No.	Major Feature
HE-GVC-00015	The Chalet
<i>HE-GVC-00049</i>	<i>Bridge No. 6247*</i>
HE-GVC-00050	Bridge No. L9327
HE-GVC-00081	Theodore Wirth Park
HE-GVC-00082	Theodore Wirth Parkway
HE-GVC-00089	Bassett Creek Lagoons
HE-GVC-00094	Wirth Lake
HE-GVC-00097	Theodore Wirth Golf Course**

* The subsequent re-evaluation of this feature in 2013 is discussed in Section 5.4.1.2.

**The winter recreation area inventoried in the 2015 Master Plan appears to be a supporting land use of the Theodore Wirth Golf Course, as discussed further in Section 5.4.3.

In addition to these eight features identified as contributing in the draft NRHP nomination, the 2015 Master Plan identifies two “potentially contributing” features that are located within the APE and viewsheds, and were not listed in the draft NRHP nomination (MPRB 2015:5.6-5.11). “Potentially contributing” features were identified as being built within the period of significance (through 1942) and still being intact. The 2015 Master Plan states that an official determination had not been completed at the time of publication (MPRB 2015:5.5).

The two additional features identified in the 2015 Master Plan as “potentially contributing” that are located within the APE and viewsheds include the winter recreation area land use and the Germania Brewery. The historical significance and integrity of these features were further documented to inform whether these features appear to be contributing features to the GRHD. Additionally, the 2015 Master Plan identifies the Plymouth Avenue Bridge (Bridge 6247) as non-contributing, which is contrary to the prior recommendation made in the draft NRHP nomination (MPRB 2015:5.8, Roise, et al. 2012). The subsequent re-evaluation of this feature in 2013 is discussed under Section 5.4.1.2.

The two railroad lines that cross through Theodore Wirth Park, the Luce Line and the Osseo Branch Line, as well as bridges associated with each line within the Study Area, are not addressed in the current draft NRHP nomination for the GRHD, but fall within the current period of significance for the GRHD (ending in 1942). The Luce Line (HE-GVC-055 [Golden Valley Segment] and HE-MPC-9800 [Minneapolis Segment]) and two associated bridges, Luce Line Trestle over Bassett Creek (HE-GVC-376) and Luce Line Bridge over Bassett Creek (HE-MPC-5285), have been previously determined not individually eligible for listing in the NRHP. However, neither the Luce Line nor the associated bridges are identified as either contributing or non-contributing in the draft NRHP nomination for the GRHD. Similarly, the Osseo Branch Line (HE-RRD-002) has been determined individually eligible for the NRHP, but was not identified as a contributing or non-contributing resource to GRHD in the draft NRHP nomination. One bridge associated with the Osseo Branch Line, Bridge 1.7 (HE-GVC-5286), has been previously determined to be non-contributing to the Osseo Branch Line and not individually eligible for listing in the NRHP; however, the bridge was also not identified as either a contributing or non-contributing resource to GRHD in the draft NRHP nomination. Both of these railroad lines and their associated bridges were constructed within the currently documented period of significance (1887-1942) for the GRHD. However, despite being constructed during this time period, neither railroad line, nor their associated bridges reflect the design intent of Theodore Wirth Park and are not related to the areas of significance for which the GRHD qualifies for listing in the NRHP. Therefore, the Luce Line and the Osseo Branch Line, along with the Luce Line Trestle over Bassett Creek, the Luce Line Bridge over Bassett Creek, and the Osseo Branch Line Bridge 1.7, appear to be non-contributing to the GRHD.

5.4.1.1 Germania Brewery

The Germania Brewery is identified as “potentially contributing” in the 2015 Master Plan. This feature was developed in 1887 prior to the acquisition of this portion of Theodore Wirth Park and was not intentionally incorporated into plans for the park or Grand Rounds system. It has been determined individually eligible for the NRHP under Criterion A as an industrial/recreation site associated with Germania Brewery and Criterion D for the information potential of the Germania Park, Gilbert Resort, and summer garden regarding the lifeways of Germanic peoples. However, it does not reflect the documented significance of the GRHD under Criterion A in the areas of Community Planning and Development and Entertainment/Recreation, or Criterion C for Landscape Architecture (Vermeer 2012). Therefore, this feature appears to be non-contributing to the GRHD.

5.4.1.2 Plymouth Avenue Bridge (Bridge 6247) / Plymouth Avenue

Bridge 6247 carries Plymouth Avenue over the Osseo Branch Line and provides an eastern entrance to the park. It had been previously evaluated and determined to be a contributing feature to the GRHD (Roise et al. 2012). However, due to a substantial rehabilitation in 2006 that replaced the road deck and railings and added new light fixtures, the bridge retains poor historical integrity and was evaluated as part of MnDOT's Minnesota Phase 2 Local Historic Bridge Study in 2013 as not-individually eligible for NRHP-listing and non-contributing to the GRHD (Mead & Hunt, et al. 2015:A1).

The route of the Plymouth Avenue extension (roadway), which travels over the Plymouth Avenue Bridge, was first depicted in the *1914 General Plan for the Improvement of Glenwood Park* (MBPC 1915:94a). Theodore Wirth began advocating for the route in the MBPC Annual Report for 1916 as an integral component of the Grand Rounds system and a scenic approach to the Chalet (MBPC 1917:40). It is

featured consistently in subsequent historical plans for the park (MBPC 1917:41; MBPC 1918:38; MBPC 1921:75; MBPC 1927:96a). While the route would not receive final curbs and pavement until after the embankment for Bridge 6247 was stabilized in 1933, the route was in place several years prior to the construction of this bridge (MBPC 1922:71; MBPC 1934:66, Atwood 2009a).

The current alignment of Plymouth Avenue follows its historic alignment as depicted in historical plans and aerial photographs, except for its intersection with Theodore Wirth Parkway (ASCS 1937; ASCS 1971). The intersection was altered sometime between 1971 and 1979 (ASCS 1971; NETR 1979). However, the alteration was not depicted as part of the transportation recommendations in the Eckbo Plan (Eckbo et al. 1971:3.3-3.4; 3.76). The current roadway width measures between 35 feet and 50 feet (where a bus stop is located), which is not consistent with the parkway recommendations contained in the Eckbo Plan. Rose-chip sealed pavement is not visible on any portion of the roadway, as recommended by the Eckbo Plan for parkways within the Grand Rounds parkway system. The current alignment of this intersection extends Theodore Wirth Parkway south along the former alignment of Plymouth Avenue, and shifts the intersection of these roadways to the southeastern corner of the parking lot. As such, the length of Plymouth Avenue is shortened and the intersection is simplified from its historic Y-form with a center planting island to a basic T-form. This alteration somewhat compromises the integrity of design, workmanship and materials at the western end of the route. However, the route still retains its sense of direction and destination. Additionally, the 2006 rehabilitation of Bridge 6247 slightly compromises the integrity of feeling at the eastern end of the route. While the design of the above-deck elements are of a similar Classical Revival aesthetic as the original, the historic sense of the past is no longer conveyed by the bridge at road grade; the 2006 rehabilitation also slightly compromises the integrity of setting at the eastern end of the route since the bridge railings and contemporary lights no longer convey the full historic character of the physical environment at road grade. The wooded setting at Bridge 6247 depicted in historical aerial photographs and plans is still present today and contributes to the historic integrity of its setting at the eastern end (MBPC 1914:94a; MBPC 1917:41; MBPC 1927:96). The historic east-west orientation of Plymouth Avenue is maintained, as well as the historic north-south location of the alignment relative to the Chalet building. The historic function of Plymouth Avenue as an eastern approach to the Chalet is also maintained. Therefore, it retains good integrity of location and association.

Overall, although the Plymouth Avenue Bridge is not eligible for listing in the NRHP, either individually or as a contributing feature to the GRHD, Plymouth Avenue (roadway) retains sufficient integrity to convey its historical significance. While the integrity of the east and west connecting points of the route have been slightly compromised, the route, on whole, retains its sense of direction, destination, and overall setting as an eastern access route to Theodore Wirth Park, as well as its grading and views approaching the Chalet. Therefore, Plymouth Avenue appears to be a contributing feature to the GRHD (see Figure 119A).

5.4.2 ADDITIONAL FEATURES IN THE APE AND VIEWSHEDS: 1943-1975

This cultural landscape study also documented the following features within the APE and viewsheds based on their date of construction within the extended period of significance that is currently under evaluation, and their relationship to the areas of significance for which the GRHD is eligible for listing in

the NRHP: the Finnish-American Monument and features implemented in accordance with the Eckbo Plan. In addition, Bridge 5908 (HE-GVC-00056), which is currently identified as non-contributing in the draft NRHP nomination but falls within the extended period of significance, is also discussed. The overall presence of these features in relationship to Theodore Wirth Park and the GRHD, as a whole, and the integrity of the features were documented through research and field survey.

5.4.2.1 Finnish-American Monument

The Finnish-American Monument is currently indicated as non-contributing in the draft NRHP nomination due to its date of construction. This monument was constructed in 1958 at the center of Picnic Ground No. 4. It is similar in its commemorative nature, use of stone material, and ornamental value to other historical markers in the GRHD. Many of these historical markers are also recommended contributing resources to the historic district (Roise et al. 2012). The Finnish-American Monument maintains good integrity of location, design, setting, materials, workmanship, feeling, and association. It was constructed within the potential extended period of significance (assumed through 1975) that is currently under evaluation. Therefore, this monument appears to be contributing to the GRHD within the extended period of significance, under Criterion C in the area of Landscape Architecture, for its ornamental value that is consistent with similar features across the historic district (see Figure 119B).

5.4.2.2 Eckbo Plan and Related Features

The Eckbo Plan focused on reinforcing the recreational qualities of the park and resolving transportation conflicts. The period of significance for the GRHD is currently documented as 1884 to 1942, although it is currently being evaluated to determine if it possesses significance within the period 1943 through the mid-1970s, reflecting the potential significance of improvements developed in accordance with the plan by Eckbo, Dean, Austin and Williams.

Circulation features implemented as a result of the Eckbo Plan appear to be contributing to the significance of the GRHD if this extended period is determined significant. Paved pedestrian and bicycle paths, and the pedestrian bridge over the parkway at the Chalet, were both recommended in the plan. The locations of the paths reflect the concept of a proposed “Bicycle Grand Rounds” stated in the plan. This pathway runs the entire length of the parkway that is located in the APE and viewsheds. The paved pathway west of Theodore Wirth Parkway retains good integrity of location, setting, association, and feeling. Integrity of design and materials is less clear since the intent of the plan was not design-focused. Overall, the paved pathway west of Theodore Wirth Parkway appears to convey the significance of the Eckbo Plan under Criterion A in Community Planning and Development and Entertainment/Recreation, and Criterion C in the area of Landscape Architecture for its association with Eckbo, Dean, Austin and Williams. Therefore, the paved pathway west of Theodore Wirth Parkway appears to be contributing, dependent on the final determination of the period of significance for the GRHD (see Figure 119A).

While the wooden footbridge at the Chalet is present at the location recommended in the Eckbo Plan, it does not appear in aerial photographs until 1991, which is outside of the period of significance under discussion. Therefore, the pedestrian bridge at the Chalet appears to be non-contributing to the GRHD.

The bicycle and pedestrian path parallel to the Osseo Branch Line tracks appears to be non-contributing to the GRHD. This path runs from Highway 55 to the picnic area located east of Bridge L9327. The location

of this path within railroad ROW, its discontinuous surfacing and lack of signage, and its at-grade intersection with the Luce Line tracks are not consistent with the intent of the Eckbo Plan to enhance recreational value and resolve transportation conflicts. Additionally, the plan depicted an underpass for the pedestrian and bicycle path at the Luce Line tracks that would alleviate the crossing conflict, which is not present. Historical aerial photographs between 1937 and 1979 show an old service road from Highway 55 to the Luce Line tracks existed roughly in the same alignment as the present-day trail; however, the service road did not cross the tracks (ASCS 1938; NETR 1979). The present day trail and crossing at the Luce Line tracks first appear in a 1991 aerial photograph (NETR 1991). The pathway does not appear to be implemented as a result of Eckbo Plan recommendations or any other historic plans for the Theodore Wirth Park within the extended period of significance through 1975. Therefore, the pathway adjacent to the Osseo Branch Line tracks on railroad ROW appears to be non-contributing to the GRHD.

Many of the small-scale features installed concurrently with circulation improvements recommended by the Eckbo Plan appear to be contributing. The cube-style lighting, designed by Alfred French to implement recommendations in the Eckbo Plan, appears to be contributing to the historic significance of the GRHD, if the Eckbo Plan improvements are determined to be significant (see Figure 119A). The blocky wood benches with the bollard-and-chain surrounds at the Chalet, and the picnic tables located east of the Chalet that exhibit a similar aesthetic, appear to date within the extended period of significance and support the continued recreational use of the park, as intended by the Eckbo Plan. Therefore, these features appear to have potential significance as improvements consistent with Eckbo Plan recommendations (see Figure 119A). These small-scale features support Criterion A in the areas of Community Planning and Development and Entertainment/Recreation as they enhance the overall function and use of the park. While these small-scale features do not maintain a strong or cohesive presence across Theodore Wirth Park, the aesthetic of light standards, picnic tables, and benches are unique and recognizable within the extended period of significance, and therefore appear to have significance under Criterion C. While the signage program developed by Peter Seitz appears to have historical significance, none of these features exist within the APE and viewsheds. Therefore, the signage present in the APE and viewsheds does not appear to be contributing to the GRHD.

5.4.2.3 Bridge 5908

Bridge 5908 is currently indicated as non-contributing in the draft NRHP nomination due to its date of construction. The bridge carries Highway 55 over Bassett Creek and was originally constructed in 1947, within the potential extended period of significance for the GRHD that is currently under discussion. However, the north end was rebuilt in 1987 (Pearson 2008q). In addition, its design and planning are not related to historic plans for park development and do not contribute to the areas of significance for the GRHD. Therefore, Bridge 5908 appears to be non-contributing to the GRHD.

5.4.3 OTHER CHARACTER-DEFINING FEATURES IN THE APE AND VIEWSHEDS

Additional information is provided on the winter recreation area land use, Picnic Ground No. 4 (including the WPA picnic tables and WPA-era entrance sign), paths south of Highway 55, and the exposed aggregate bench located along Plymouth Avenue below. These features have not been previously determined as contributing or non-contributing features to the GRHD (Roise et al. 2012, MPRB 2015).

These features have also not been previously inventoried as part of the statewide survey of historic properties on file at MnSHPO.

The winter recreation area land use is located within Theodore Wirth Golf Course. Theodore Wirth Golf Course has previously been determined as a contributing feature to the GRHD; however, the winter recreation area land use has not (Roise et al. 2012:137-138). The golf course has been used consistently throughout its history for winter recreation activities. Winter recreation is a historically significant land use within Theodore Wirth Golf Course that contributes to its entertainment/recreation value. However, winter recreation uses occur throughout the golf course and are not confined to a discrete area. Ski jumps were historically located on the 10th fairway and are currently non-extant; however, the 2015 Master Plan has indicated that below ground archaeological remains may exist (MPRB 2015:5.6). Since the presence of these remains has not been determined, and the location of other winter recreation activities is not precise, the winter recreation area land use currently appears to be a supporting land use within the Theodore Wirth Golf Course rather than a separate contributing or non-contributing feature of the GRHD (see Figure 119A).

Picnic Ground No. 4 was constructed by 1939 based on the WPA stamps in the concrete benches (see Figure 119B). While specific plans for the picnic area were not included in MBPC Annual Reports, the grounds exhibit the character-defining vegetation, topography, and views that relate to the original design intent for the park. When the land around Wirth Lake was acquired in 1907, Wirth described its condition as "the site of an old beer garden and resort of dubious character and reputation [that] had long been an eyesore and detriment to that section of the city" (Wirth 2006:174). Citizens had petitioned the MBPC to acquire the land, which was then developed into an attractive and popular picnic area according to Wirth. Its development as a scenic picnic area takes advantage of the natural topography and water features in the park. Picnic Ground No. 4 also has a clear relationship to adjacent picnic grounds south of Wirth Lake and south of Glenwood Avenue, and the Picnic Pavilion (located outside of Picnic Ground No. 4). The WPA constructed permanent concrete and metal post picnic tables that are set into the ground in Picnic Ground No. 4. These tables have a unique style that is not found in other areas of the park. Their quantity compared to other styles of picnic benches present in the area creates a strong presence. The stamps on the seats indicate these tables were constructed in 1939 by the WPA. These tables are notable evidence of the federal relief efforts that provided lasting utilities and recreational amenities throughout Theodore Wirth Park and the GRHD. Several other features are located in Picnic Ground No. 4 that appear to support the recreational use of the grounds, and are, or appear to be associated with the WPA: the oblong, metal entrance sign (see Figure 113); a cobblestone wall surrounding the water pump located east of the parking lot for Picnic Ground No. 4 constructed in 1940 by the WPA; and a concrete sandbox on one of the hilltops in Picnic Ground No. 4 constructed by the WPA.

While the design, materials, and workmanship of Picnic Ground No. 4 are not well-documented historically, it has good integrity of location, setting, feeling and association conveying the historic planning and development intent of Theodore Wirth Park. While the benches show signs of deterioration, they have good integrity of location, setting, design, materials, workmanship, feeling, and association. Therefore, it appears that Picnic Ground No. 4 and the WPA picnic tables are contributing features to the GRHD, under Criterion A in the area of Community Planning and Development and

Entertainment/Recreation (see Figure 119B). Within the land use area of Picnic Ground No. 4, the entrance sign, cobblestone wall surrounding the water pump, and concrete sandbox also appear to be contributing under Criterion A in the areas of Community Development and Planning and Entertainment/Recreation as they support the use of Picnic Ground No. 4.

Select segments of paved pathways located in the APE and viewsheds appear to follow the alignment of pathways either shown in Wirth's 1914 plan and/or were present in historic aerial photographs during the potential extended period of significance through 1975. These segments are located east of Wirth Lake, within or near Picnic Ground No. 4 (see Figure 119B). These pathways appear to contribute to the historical significance of the GRHD under Criterion A in the area of Community Planning and Development and Entertainment/Recreation and Criterion C in the area of Landscape Architecture, since they reflect circulation routes in Wirth's 1914 plan and support the overall use and enjoyment of Wirth Lake and Picnic Ground No. 4.

Additionally, one of the exposed-aggregate style benches located along Plymouth Avenue appears to date within the potential extended period of significance. This double-seat bench is located on the south side of Plymouth Avenue just west of the Route 7 southbound bus stop (see Figure 119A). Based on the style of the bench and aging of the wood and concrete, this bench appears to pre-date 1975. Overall, this style of bench was implemented across the parkway system beginning in the 1930s and is still currently manufactured and installed by MPRB today. While many of examples of this style are located throughout Theodore Wirth Park, this individual bench located near the Route 7 southbound bus stop along Plymouth Avenue appears to have been installed at an earlier date. This bench appears to contribute to the historical significance of the GRHD under Criterion A in the area of Community Planning and Development and Entertainment/Recreation since it supports the overall use and enjoyment of the park, and under Criterion C in the area of Landscape Architecture since it reflects a distinctive style of furnishings that was developed for the parkway system and consistently implemented throughout its history.

Other character-defining features identified during field survey and described in Section 5.2 Character Defining Features in the APE and Viewsheds appear to be non-contributing to the GRHD. These features either date to outside of the period of significance or do not contribute to the areas of significance that the GRHD is eligible under and, therefore, 106 Group concurs with the remaining recommendations under the draft NRHP nomination. However, the following two features within the APE and viewsheds have been individually inventoried and determined individually eligible for listing in the NRHP: Germania Brewery (21HE0407) and the Osseo Branch Line (HE-RRD-002).

Table 6 summarizes the additional features in the APE and viewsheds that appear to be contributing to the GRHD based on the historical research and field survey completed for this cultural landscape study. A total of seven additional features were identified as a result of this cultural landscape study.

Table 6. Additional Features in the APE and Viewsheds that Appear to be Contributing

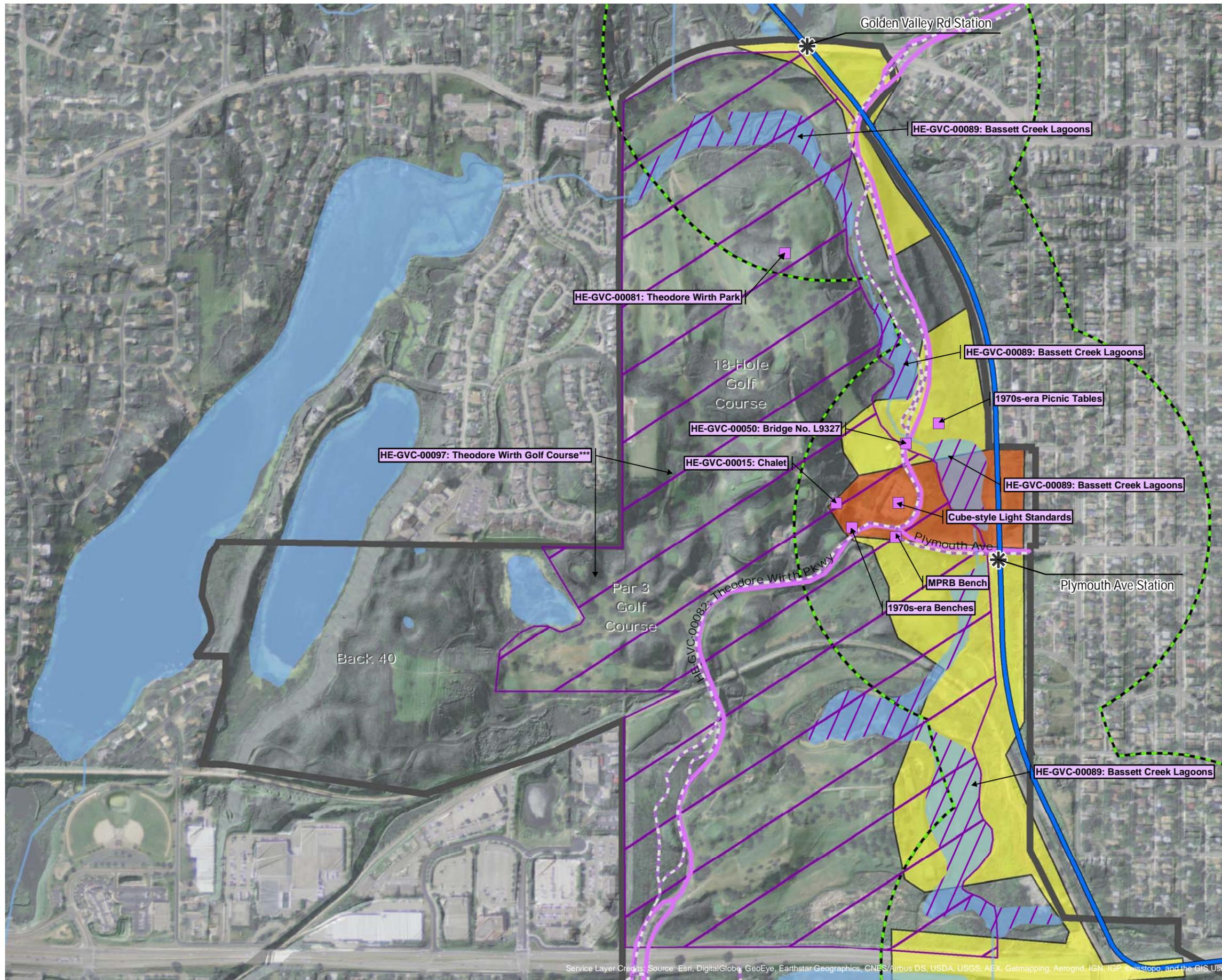
Inventory No.	Features within the APE and Viewsheds	Appear to be Contributing
HE-GVC-00095	Finnish-American Monument	Y
n/a	Picnic Ground No. 4 (including WPA Picnic Tables, WPA cobblestone wall, WPA concrete sandbox, and WPA-era entrance sign)	Y
n/a	Paved Pedestrian and Bicycle Path west of Theodore Wirth Parkway	Y
n/a	1970s-Era Small-Scale Features (cube style light standards; benches and picnic tables)	Y
n/a	Pathways south of Highway 55	Y
n/a	MPRB Exposed-Aggregate Bench (on Plymouth Avenue)	Y
n/a	Plymouth Avenue (route)	Y

Table 7 summarizes all of the features located within the APE and viewsheds that are currently determined, and appear to be contributing to the GRHD. In total, 14 features were identified as contributing features, that have either previously been determined as contributing or appear to be contributing based on the documentation completed for this cultural landscape study. The locations of these features are also depicted on Figures 119A and 119B.

Table 7. Summary: All Features in the APE and Viewsheds that are Determined or Appear to be Contributing

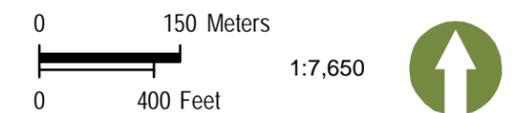
Inventory No.	Features within the APE and Viewsheds
HE-GVC-00015	The Chalet
HE-GVC-00050	Bridge No. L9327
HE-GVC-00081	Theodore Wirth Park
HE-GVC-00082	Theodore Wirth Parkway
HE-GVC-00089	Bassett Creek Lagoons
HE-GVC-00094	Wirth Lake
HE-GVC-00097	Theodore Wirth Golf Course
HE-GVC-00095	Finnish-American Monument
n/a	Picnic Ground No. 4 (including WPA Picnic Tables, WPA cobblestone wall, WPA concrete sandbox, and WPA-era entrance sign)
n/a	Paved Pedestrian and Bicycle Path west of Theodore Wirth Parkway
n/a	1970s-Era Small-Scale Features (cube style light standards; benches and picnic tables)
n/a	Pathways south of Highway 55
n/a	MPRB Exposed-Aggregate Bench (on Plymouth Avenue)
n/a	Plymouth Avenue (route)

Blue Line Extension LRT (BLRT)
Theodore Wirth Regional Park
Cultural Landscape Study
Minneapolis and Golden Valley, Minnesota



- Proposed Alignment
 - Proposed Station
 - Architecture/History Area of Potential Effect
 - Study Area
 - Viewshed of Project
 - Chalet Viewshed of Project
- Contributing Features**
- Individual Feature Area within Theodore Wirth Park (See Label)*
 - Feature Location (See Label)
 - Linear Feature (See Label)
 - Regional and Paved Trail**

* Individual feature areas do not include the full extent of Theodore Wirth Park.
 ** Trails indicated may not constitute all park trails.
 *** The area included on the current inventory form for the Theodore Wirth Golf Course includes the two golf courses and the Back 40. The area depicted here encompasses the approximate boundaries of only the two golf courses.

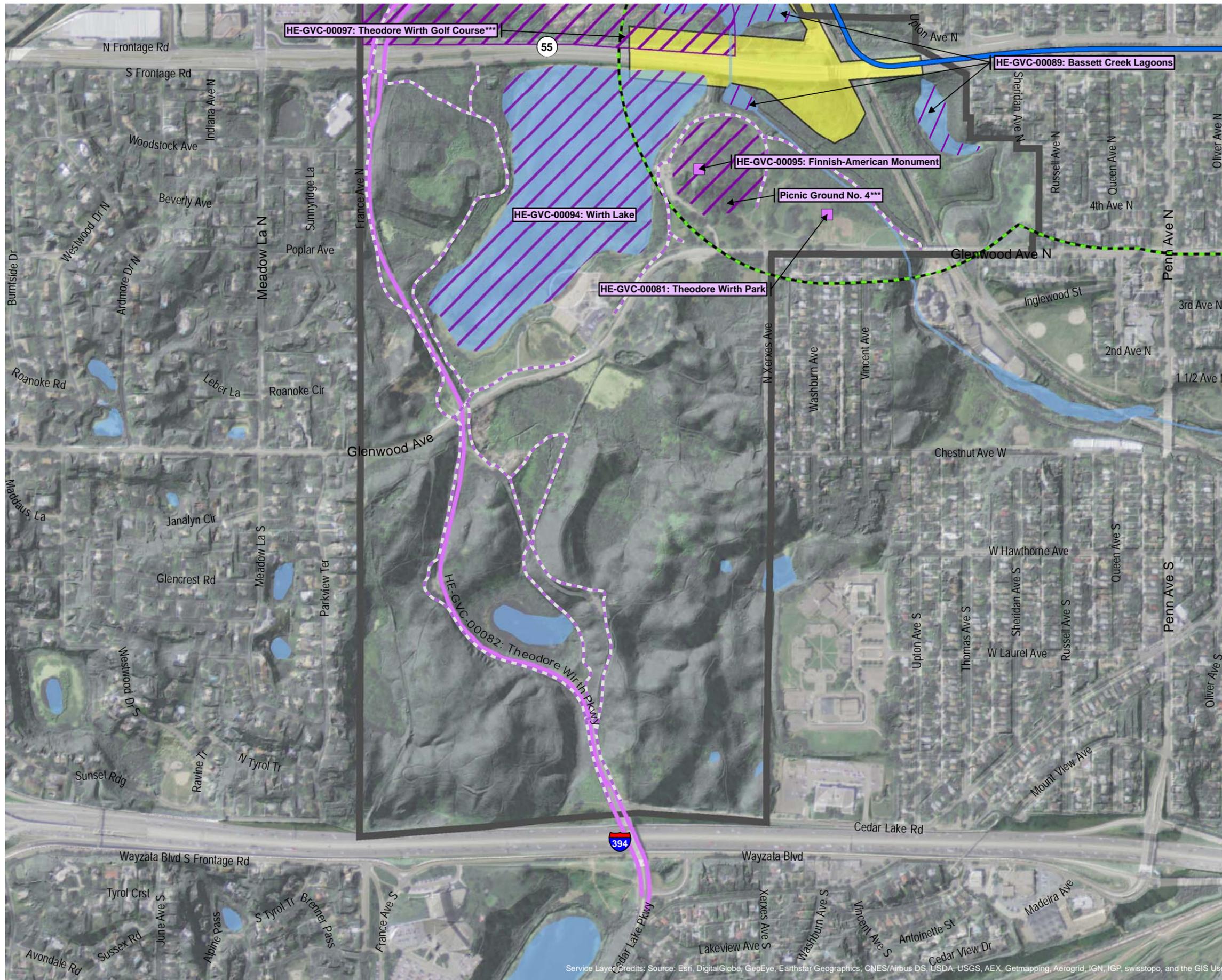


Contributing Features of Park within
APE and Viewsheds - North Half

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, Swisstopo, and the GIS User

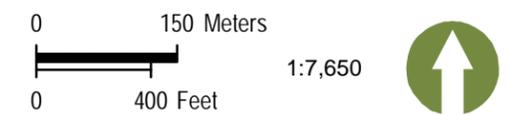
Figure 119A

Blue Line Extension LRT (BLRT)
Theodore Wirth Regional Park
Cultural Landscape Study
Minneapolis and Golden Valley, Minnesota



- Proposed Alignment
- Architecture/History Area of Potential Effect
- Study Area
- Viewshed of Project
- Contributing Features**
 - Individual Feature Area within Theodore Wirth Park (See Label)*
 - Feature Location (See Label)
 - Linear Feature (See Label)
 - Regional and Paved Trail**

* Individual feature areas do not include the full extent of Theodore Wirth Park.
 ** Trails indicated may not constitute all park trails.
 ***Includes
 10-15 WPA Tables 4-5 Other Tables
 1 WPA-era Entrance Sign 2-3 Grills
 1 Water Pump w/ WPA Cobblestone Wall
 ****The area included on the current inventory form for the Theodore Wirth Golf Course includes the two golf courses and the Back 40. The area depicted here encompasses the approximate boundaries of only the two golf courses.



Contributing Features of Park within APE and Viewsheds - South Half

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User

Figure 119B

6.0 SUMMARY

This cultural landscape study addresses Theodore Wirth Regional Park within the combined boundary from the draft NRHP nomination and the current park boundary (Study Area) and focuses more specifically on features located within the APE and viewsheds; it does not address other MPRB-owned properties or other historic resources that are located outside of the current Study Area. The specific purpose of this cultural landscape study includes the following:

- Provide a historic context for Theodore Wirth Park and document its developmental history to provide an understanding of the landscape features of the park (see Section 3).
- Identify viewsheds within Theodore Wirth Park where the BLRT project may be visible, including the four viewsheds specifically identified by the MPRB and MnDOT CRU, and identify any other viewsheds that may exist through field survey and comparing those areas to the current APE (see Section 4).
- Identify the physical characteristics of the landscape, including a broad overview across the entire park and specific details within the APE and viewsheds, using existing documents and field survey (see Sections 5.1 and 5.2).
- Identify contributing elements to the GRHD within the APE and viewsheds where properties may be affected by the proposed BLRT project (see Section 5.4).

Reconnaissance-level historical research, field survey, and documentation was completed for Theodore Wirth Park, as a whole, while more intensive-level historical research, field survey, and documentation was completed within the APE and viewshed areas. Field survey documented viewsheds to the proposed BLRT project from areas within Theodore Wirth Park, and identified the locations of character-defining and contributing resources.

Overall, the current APE was found to capture all of the viewsheds in the Study Area except for one area in Theodore Wirth Golf Course, located north of Highway 55, encompassing approximately 5.5 acres. A total of 14 features located within the APE and viewsheds have been previously determined or appear to be contributing features to the GRHD. These features were identified through research and field survey. As a result, these 14 features within the APE and viewsheds contribute, or appear to contribute to the historical significance of Theodore Wirth Park and the GRHD during the period of 1884 to 1975.

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APPENDIX A: ELIGIBILITY OF
PROPERTIES WITHIN THEODORE
WIRTH PARK IN MNSHPO INVENTORY
(APRIL 2015)

Current Eligibility of Properties Located in Theodore Wirth Park within the MnSHPO Inventory

Feature (* Notes features in APE and Viewsheds)	Inventory No.	Draft NRHP Nomination Contributing/Non-Contributing Status (C/NC)	Individual NRHP Eligibility
Birch Pond I	21HE0342	Not Previously Determined	Not Previously Determined
Birch Pond II	21HE0343	Not Previously Determined	Not Previously Determined
Keegan/Schell Farmstead	21HE0405	Not Previously Determined	Not Previously Determined
Heckrich's Saloon	21HE0406	Not Previously Determined	Not Previously Determined
Germania Brewery*	21HE0407	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	NRHP-Eligible
The Chalet*	HE-GVC-00015	C	Not Previously Determined
Bridge 6247 (Plymouth Ave. bridge)*	HE-GVC-00049	<i>C (appears to be non-contributing based on 2013 re-evaluation)</i>	Not-Eligible
Bridge L9327 (WPA bridge)*	HE-GVC-00050	C	NRHP-Eligible
Bridge 5908*	HE-GVC-00056	<i>NC (appears to be non-contributing to the GRHD within the potential extended period of significance)</i>	Not Previously Determined
Theodore Wirth Park*	HE-GVC-00081	C	Undetermined by SHPO
Theodore Wirth Parkway*	HE-GVC-00082	C	Not Previously Determined
Picnic Pavilion	HE-GVC-00083	C	Not Previously Determined
Par 3 Golf Course Clubhouse	HE-GVC-00085	NC	Not Previously Determined
Tool Building	HE-GVC-00086	C	Not Previously Determined
Par 3 Golf Course	HE-GVC-00087	NC	Not Previously Determined
Bassett Creek Lagoons*	HE-GVC-00089	C	Not Previously Determined

Feature (* Notes features in APE and Viewsheds)	Inventory No.	Draft NRHP Nomination Contributing/Non- Contributing Status (C/NC)	Individual NRHP Eligibility
Bridge 27678*	HE-GVC-00091	NC (<i>appears to be non-contributing, outside of the potential extended period of significance</i>)	Not Previously Determined
Wirth Lake Beach House	HE-GVC-00092	NC	Not Previously Determined
Wirth Lake Beach	HE-GVC-00093	C	Not Previously Determined
Wirth Lake*	HE-GVC-00094	C	Not Previously Determined
Finnish-American Monument*	HE-GVC-00095	NC (<i>appears to be contributing under potential extended period of significance</i>)	Not Previously Determined
Bridge 27677	HE-GVC-00096	NC	Not Previously Determined
Theodore Wirth Golf Course*	HE-GVC-00097	C	Not Previously Determined
Theo Wirth Interpretive Statue Garden*	HE-GVC-00098	NC (<i>appears to be non-contributing, outside of the potential extended period of significance</i>)	Not Previously Determined
Loring Cascade	HE-GVC-00099	NC	Not Previously Determined
Glenwood Line Streetcar Shelter	HE-GVC-00100	C	Not Previously Determined
Luce Line (Golden Valley Segment)*	HE-GVC-055	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	Not-Eligible
Luce Line Trestle over Bassett Creek*	HE-GVC-376	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	Not-Eligible

Feature (* Notes features in APE and Viewsheds)	Inventory No.	Draft NRHP Nomination Contributing/Non- Contributing Status (C/NC)	Individual NRHP Eligibility
Birch Pond	HE-MPC-01898	C	Not Previously Determined
Martha E. Crone Visitors Shelter	HE-MPC-01899	NC	Not Previously Determined
Quaking Bog	HE-MPC-01906	C	Not Previously Determined
Bridge 27607*	HE-MPC-01907	NC (<i>appears to be non-contributing, outside of the potential extended period of significance</i>)	Not Previously Determined
Victory Memorial Drive Boulder	HE-MPC-01910	C	Not Previously Determined
Eloise Butler Wildflower Garden	HE-MPC-05098	C	Not Previously Determined
Luce Line Bridge over Bassett Creek*	HE-MPC-5285	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	Not-Eligible
Bridge 1.7*	HE-MPC-5286	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	Not-Eligible
Bridge 27237*	HE-MPC-5287	Not Previously Determined (<i>appears to be non-contributing, outside of the potential extended period of significance</i>)	Not-Eligible
Luce Line (Minneapolis Segment)*	HE-MPC-9800	Not Previously Determined (<i>appears to be non-contributing to the GRHD</i>)	Not-Eligible

Feature (* Notes features in APE and Viewsheds)	Inventory No.	Draft NRHP Nomination Contributing/Non- Contributing Status (C/NC)	Individual NRHP Eligibility
Osseo Branch Line*	HE-RRD-002	Not Previously Determined (<i>appears to be non- contributing to the GRHD</i>)	NRHP-Eligible
Xcel Energy Transmission Line*	HE-TRL-001	Not Previously Determined (<i>appears to be non- contributing to the GRHD</i>)	Not-Eligible
Highway 55 over East Channel of Bassett Creek*	HE-MPC-5288	Not Previously Determined (<i>appears to be non- contributing to the GRHD</i>)	Not-Eligible

APPENDIX B: PROJECT PERSONNEL

LIST OF PERSONNEL

Principal-In-Charge

Anne Ketz, M.A., RPA

Project Manager

Jennifer Bring, B.S.

Principal Investigator

Parisa Ford, M.S., AICP

Field Historians

Kelli Andre Kellerhals, M.S.

Parisa Ford, M.S., AICP

Katie Ohland, M.S.

Graphics and GIS

Nathan Moe, B.A.

**SECTION 106 PROGRAMMATIC AGREEMENT
BETWEEN
THE FEDERAL TRANSIT ADMINISTRATION
AND
THE MINNESOTA STATE HISTORIC PRESERVATION OFFICE
REGARDING THE CONSTRUCTION OF
THE INTERCHANGE PROJECT
MINNEAPOLIS, MINNESOTA**

WHEREAS, the Hennepin County Regional Railroad Authority (HCRRRA) and the Metropolitan Council (MC) are proposing to construct The Interchange Project (PROJECT), an intermodal transit facility in downtown Minneapolis as more fully described in the project Environmental Assessment (EA); and

WHEREAS, HCRRRA and MC are proposing to use funding assistance from the Federal Transit Administration (FTA) to implement the PROJECT, assistance that would render the PROJECT a Federal undertaking pursuant to Section 106 of the National Historic Preservation Act (Section 106), 16 U.S.C. Section 470(f), as amended; and

WHEREAS, FTA, HCRRRA and MC have consulted with the Minnesota State Historic Preservation Officer (MnSHPO) pursuant to federal regulations at 36 CFR Part 800 implementing Section 106; and

WHEREAS, the FTA invited the Advisory Council on Historic Preservation (ACHP) to participate in the development of this AGREEMENT and the ACHP stated that it will not participate in the consultation by letter dated November 21, 2011 to the FTA; and

WHEREAS, the City of Minneapolis (CITY) has elected to participate as a consulting party in the Section 106 process for this PROJECT and has been invited to concur with this AGREEMENT; and

WHEREAS, the Minnesota Ballpark Authority, as owner of the adjacent Target Field stadium, has participated in this consultation and has been invited to concur with this AGREEMENT; and

WHEREAS, upon initiation of the Section 106 consultation process and in accordance with 36 CFR 800.2(c)(2)(ii), the FTA contacted the Shakopee Mdewakanton Sioux Community, the Prairie Island Indian Community, the Lower Sioux Indian Community, and the Upper Sioux Indian Community, all federally recognized tribes, inviting their participation in the consultation process for this project, and received no responses requesting further consultation; and

WHEREAS, this AGREEMENT was developed with appropriate public involvement (pursuant to 36 CFR 800.2(d) and 800.6(a)) coordinated with the scoping, public review and comment, and public hearings conducted by FTA and HCRRA to comply with NEPA and its implementing regulations; and

WHEREAS, the FTA and the Minnesota Department of Transportation Cultural Resources Unit (MnDOT CRU), in consultation with MnSHPO, have determined the Area of Potential Effect (APE) for the project as shown on Attachment A to this AGREEMENT; and

WHEREAS, FTA and MnDOT CRU, in consultation with MnSHPO have identified historic properties in the PROJECT's APE which are listed in or eligible for the National Register of Historic Places (NRHP), as shown in Attachment A to this AGREEMENT, and MnSHPO has concurred with these determinations; and

WHEREAS, the full range of effects on historic properties will not be known prior to the approval of grant funds, and this AGREEMENT provides for ongoing consultation to assess effects and stipulate measures to avoid, reduce, or mitigate adverse effects, in fulfillment of the requirements of Section 106 in accordance with 36 CFR 800.14(b)(1)(ii); and

WHEREAS, the FTA will be responsible for ensuring that HCRAA and MC ensure that all aspects of PROJECT implementation meet the terms of this AGREEMENT, in consultation with MnDOT CRU, which assisted the FTA in the preparation of information, analysis, and recommendations regarding the Section 106 process; and

WHEREAS, the HCRRA and MC will administer the implementation of the PROJECT and will complete the stipulations of the AGREEMENT;

NOW, THEREFORE, the FTA, MnSHPO, HCRRA, and MC agree that the PROJECT will be implemented in accordance with the following stipulations in order to take into account the effects of the undertaking on historic properties.

STIPULATIONS

FTA will ensure that HCRAA and MC will carry out the terms of this AGREEMENT and will require, as a condition of any approval of FTA funding for the PROJECT, adherence to the stipulations of this AGREEMENT. The parties understand that time is of the essence in the delivery of the PROJECT, and will use good faith efforts in implementing the terms of this AGREEMENT so as not to cause unreasonable delay in the PROJECT schedule.

I. PROJECT DESIGN DEVELOPMENT

- A. The PROJECT design will effectively meet the project purpose and need, while avoiding, minimizing, and/or mitigating adverse effects to historic properties in the area. Avoidance of adverse effects is preferable and will be considered to the extent feasible.

- B. New construction on the project site, located immediately across 5th Street North from the Minneapolis Warehouse Historic District, has potential visual and functional effects on the historic features of the district, including its setting, buildings and streetscape features. HCRRA and MC will develop the project design in accordance with the Secretary of the Interior's Standards for Archaeology and Historic Preservation (SOI STANDARDS), taking into account the suggested approaches to new construction in historic areas in the *Secretary of the Interior's Guidelines for the Rehabilitation of Historic Properties*. The CITY's *Minneapolis Warehouse Historic District Design Guidelines* (Minneapolis Heritage Preservation Commission, March 2, 2010) also provide general guidance for new construction in the adjacent historic district. (In any design issue reviewed pursuant to this AGREEMENT where there may be a conflict between the SOI STANDARDS and the CITY's guidelines, the SOI STANDARDS will take precedence.)
 1. HCRRA or MC will contract with an historical architect to work with the design-build contractor to ensure that the above-referenced standards are taken into account throughout the design-build process. The architect will meet the Secretary of the Interior's Professional Qualifications Standards for Historical Architect (36 CFR 61 Appendix A).
 2. HCRRA or MC, through MnDOT CRU, will submit the PROJECT design documents for architectural and site project elements (including the bridge structure, the LRT platform and overhead catenary system, and the site architectural and landscape elements including the plazas and the vertical circulation system) to MnSHPO and the CITY for a 30-day review and comment, with a copy to FTA. If no comments are received in this period, HCRRA and MC may presume there are no comments. The PROJECT Conceptual Plans (10/20/11) and the PROJECT Urban Design Guidelines (11/29/11 draft) have been submitted to MnSHPO and the CITY for review and comment. The following documents will be submitted to MnSHPO and the CITY during the design process:
 - a. The PROJECT Design-Build Concept Drawings, developed by the selected design-build contractor as part of their project proposal.
 - b. The PROJECT Design Development Drawings, developed by the design-build contractor in consultation with HCRRA.
 - c. The PROJECT Final Design Plans, developed by the design-build contractor in consultation with HCRRA.
 3. HCRRA or MC and the design-build contractor will incorporate comments from MnSHPO and the CITY, as feasible, on the PROJECT Design-Build Concept Drawings and on the

PROJECT Design Development Drawings, for all PROJECT elements with potential effects on historic properties. Within two weeks of receipt of comments, HCRRA or MC's historic architect will provide MnSHPO and the CITY with a summary of how the comments have been addressed in the PROJECT design, with a copy to MnDOT CRU. If there are any portions of the PROJECT where it is not feasible to incorporate comments from MnSHPO and the CITY, HCRRA or MC will provide an explanation.

4. Following MnSHPO review and comment on the PROJECT Design Development Drawings, pursuant to Stipulation I.B.2.b., above, HCRRA or MC's historic architect (see Stipulation I.B.1, above) will continue to monitor development of PROJECT plans to ensure that the above-referenced standards are taken into account, and will provide periodic reports to MnSHPO, the CITY, and MnDOT CRU on a schedule mutually agreed upon by MnSHPO, MnDOT CRU, and HCRRA or MC.
5. HCRRA or MC, through MnDOT CRU, will submit the PROJECT Final Design Plans to MnSHPO and the CITY, pursuant to Stipulation I.B.2.c., above, for 30-day review and comment on any aspects of the PROJECT design which are not in conformance with SOI STANDARDS or otherwise have effects on historic properties. It is recognized that, at this stage of review, many project elements will be completed or under construction.
6. If there are any portions of the PROJECT that do not meet the SOI STANDARDS, based on MnSHPO's written comments, the project elements at issue will be considered to have an adverse effect, and mitigation measures will be developed and implemented in accordance with Stipulation V of this AGREEMENT.
7. If there are any portions of the PROJECT that do not meet MnSHPO's written comments based on factors other than the SOI STANDARDS, FTA, in consultation with MnSHPO, will make a determination on whether the project elements at issue will have an adverse effect, and if, so, mitigation measures will be developed and implemented in accordance with Stipulation V of this AGREEMENT.

II. NOISE AND VIBRATION ASSESSMENT AND MIGITATION

- A. The assessment of noise and vibration issues conducted for the PROJECT Environmental Assessment (EA) (*Noise and Vibration Impact Assessment Technical Report, Interchange Light Rail Transit Enhancement Project, Kimley-Horn and Associates, Inc., October 2011*) has identified potential adverse effects from construction noise and from construction vibration on the Ford Building, a historic property located in the Minneapolis Warehouse Historic District.

- B. HCRRA or MC will develop and implement a Historic Properties Vibration and Noise Management and Remediation Plan (VNMRP) to address construction noise and vibration issues related to the Ford Building. The VNMRP will include the following elements:
1. Pre-construction survey. The VNMRP will include a methodology for a pre-construction survey of the Ford Building, which will include:
 - a. A visual survey of historically significant features of each building, completed by a historical architect (including the 7/11/11 memo *Noise and Vibration Control Review of the Ford Centre* from Chuck Liddy of Miller Dunwiddie Architecture to Chuck Ballentine of The Interchange Project).
 - b. A structural survey to identify and document pre-existing defects, completed by a qualified professional engineer.
 - c. A discussion of any fragile or loose elements needing to be temporarily removed, secured or repaired.
 2. Construction vibration and construction noise limits. The VNMRP will stipulate thresholds for construction vibration and construction noise limits at the Ford Building. Limits will be set using the criteria in the *Transit Noise and Vibration Impact Assessment* guidance manual (FTA 2006); if different thresholds are set, the plan will include supporting documentation.
 3. Construction vibration. The VNMRP will include a methodology for vibration monitoring during PROJECT construction, including details about the process, equipment, documentation standards, frequency of monitoring, and use of alternate construction means and methods when it is not possible to meet the limits.
 4. Construction noise. The VNMRP will include a discussion of specific measures to be followed to reduce and/or mitigate the effects of construction noise on tenants of the Ford Building during the construction process, including monitoring and documentation standards.
 5. Reporting of results to MnSHPO, FTA, and property owners. The VNMRP will include provisions for timely reporting of the results of the pre-construction survey, construction monitoring, and any remediation requests to MnSHPO and FTA.
 6. Notifying HCRRA or MC of noise or vibration effects. The VNMRP will include a process for notifying HCRRA or MC of any observed vibration or noise effects on the Ford Building, along with any specific provisions to address problems (including, but not limited to, cessation of construction activity, changing of construction means and methods, and other appropriate measures).
- C. HCRRA or MC will include the VNMRP by reference in the design-build contract to ensure its implementation.
- D. HCRRA or MC will develop the VNMRP in consultation with MnSHPO and the CITY, and the draft plan will be submitted to FTA and MnSHPO, through MnDOT CRU, for a 30-day review and comment period. The HCRRA or MC shall consider all comments received in a timely fashion prior to issuing the final report.

- E. The owner of the Ford Building will be consulted regarding the provisions of the VNMRP. This consultation will provide information on the purpose of, and process for completing, the pre-construction survey. This consultation will also provide the property owner information on whom to contact during construction in the event any questions or concerns may arise related to construction, including blocked access, excessive noise or vibration. In addition, the property owner will be informed of the process for seeking remediation of any potential damage during construction. Any agreements with the owner of the Ford Building that contain provisions related to vibration or noise issues will be consistent with the provisions of the VNMRP. Copies of any such agreements will be made a part of the VNMRP and/or forwarded to MnSHPO and FTA.

III. ARCHAEOLOGY

- A. The archaeological assessment of the project's Archaeological Area of Potential Effect (Attachment B to this AGREEMENT) did not identify any archaeological properties eligible for the NRHP. It did, however, identify one location within the archaeological APE along 5th Avenue North which has potential for a historical archaeological site. Subsequent PROJECT planning has determined that there is no anticipated PROJECT-related work planned for this location.
- B. HCRRA and MC will ensure that no PROJECT-related work will occur on 5th Avenue North beyond a line 50 feet north, and parallel to, the north curb line of 5th Street.
- C. HCRRA and MC will include in construction contracts appropriate provisions to ensure that Stipulations III.A. and III.B, above, are carried out by the contractor.

IV. TRAFFIC AND PEDESTRIAN CIRCULATION

- A. The re-design of the intersection of 6th Avenue North and 5th Street North may increase future vehicular traffic on 6th Avenue North between 5th Street North and Washington Avenue, through the Minneapolis Warehouse Historic District. The parties to this AGREEMENT recognize the CITY's *Warehouse District Heritage Street Plan* (adopted August 2011) as an appropriate guideline to protecting the historic features along 6th Avenue North while accommodating potential increases in vehicular and pedestrian traffic through the area.
- B. The PROJECT facilitates the coming together of several light rail lines, and, together with other developments in the area, cumulatively contributes to the need for pedestrian connections to the larger downtown area. The parties to this AGREEMENT recognize the CITY's *Minneapolis Warehouse Historic District Design Guidelines* (adopted March 2010), the CITY's *Downtown East/North Loop Master Plan* (adopted October 2003), and the CITY's *North Loop Small Area*

Plan (adopted April 2010) as appropriate guidelines to protecting the character of historic properties while providing for pedestrian connections.

V. RESOLUTION OF ADVERSE EFFECTS

- A. In any instance where the final design of PROJECT components does not meet the SOI STANDARDS, or if, in consultation with MnSHPO, FTA, HCRRA and MC determine it is not practicable to avoid other adverse effects, HCRRA or MC and MnDOT CRU will consult with MnSHPO and the CITY to develop a mitigation plan appropriate to the historic property and type and degree of effect.
- B. HCRRA or MC shall notify consulting parties to this agreement when a mitigation plan will be prepared pursuant to this stipulation. The mitigation plan shall be developed within 60 calendar days of such notification. If more time is required to develop the mitigation plan, HCRRA or MC will notify consulting parties to this AGREEMENT regarding the reason for the delay and the anticipated timeframe for mitigation plan distribution. HCRRA or MC, through MnDOT CRU, will provide a copy of the draft mitigation plan to consulting parties for a 30-day comment period during which consulting parties may provide written comments to HCRRA or MC.
- C. HCRRA or MC agrees to take into account any timely comments of consulting parties in the development of final mitigation plans. A mitigation plan will be final upon acceptance by FTA and MnSHPO. Consulting parties will receive copies of all final mitigation plans and may also be invited to concur in mitigation plans.

VI. DISCOVERY

- A. If previously unidentified historic properties are discovered unexpectedly during construction of the PROJECT, all ground-disturbing activities will cease in the area where any historic property is discovered as well as in the immediately adjacent area. The contractor will immediately notify HCRRA of the discovery and implement interim measures to protect the discovery from looting and vandalism. HCRRA will contract with a qualified archaeologist to record, document, and provide an opinion on the NRHP eligibility of the discovery to FTA within seventy-two (72) hours of receipt of notification, and will notify MnSHPO and other consulting parties, including any Indian tribes that may attach religious and cultural significance to the property, of the discovery.
- B. FTA will have ten (10) business days following notification provided in accordance with Stipulation VI.A., above, to determine the National Register eligibility of the discovery after considering timely filed views (received within seven (7) business days of notification) of the MnSHPO and other consulting parties. FTA may assume the newly discovered property to be eligible for the NRHP for the purposes of Section 106 pursuant to 36 CFR 800.13(c).

- C. For properties determined eligible, HCRRA and its qualified archaeologist, in consultation with MnSHPO, consulting parties, and FTA, will design a plan for resolving adverse effects taking into account the nature of identified properties and the feasibility of avoiding the adverse effects. Consulting parties will have seven calendar days to provide their views on the proposed plan. FTA will ensure that the timely filed recommendations of consulting parties are taken into account prior to granting approval of the measures that HCRRA will implement to resolve adverse effects. HCRRA will carry out the approved measures prior to resuming ground-disturbing work in the area of discovery.

- D. Any human remains encountered during PROJECT construction will be addressed pursuant to the Minnesota Private Cemeteries Act (Minnesota Statutes Sect. 307.08); the Native American Graves Protection and Repatriation Act of 1990, as amended, the Archaeological Resource Protection Act of 1979, as amended, and the ACHP's *Policy Statement on the Treatment of Burial Sites, Human Remains and Funerary Objects* (February 23, 2007), as applicable. If any human remains are encountered, all ground-disturbing activities will cease in the area where such remains are discovered as well as in the immediately adjacent area. The contractor will immediately notify appropriate law enforcement agencies in order to determine whether the site discovered is a crime scene, and will notify HCRRA. HCRRA will immediately notify the Office of the State Archaeologist (OSA), MnSHPO, and FTA. FTA will consult with OSA and Indian tribes to develop treatment measures for the remains. FTA will take into account the recommendations of consulting parties prior to granting approval of the plan. The FTA will ensure that HCRRA or MC has fully implemented the terms of any treatment plan prior to allowing ground-disturbing work to proceed in the area of discovery.

- E. HCRRA or MC will include in appropriate construction contracts provisions to ensure that the Stipulations VI.A through VI. D, above, are carried out by the contractor.

VII. STANDARDS

- A. All work carried out pursuant to this AGREEMENT will meet the Secretary of the Interior's Standards for Archaeology and Historic Preservation (SOI STANDARDS), taking into account the suggested approaches to new construction in the SOI STANDARDS for Rehabilitation. In instances where this is not feasible, mitigation measures will be developed and implemented pursuant to Stipulation V of this AGREEMENT.

- B. HCRRA and MC will ensure that all work carried out pursuant to this AGREEMENT will be done by or under the direct supervision of historic preservation professionals who meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61 Appendix A). The MnDOT CRU, assisting in AGREEMENT implementation through FTA designation, meets these standards for history, architectural history, precontact archaeology, and historic archaeology. FTA, HCRRA

and MC shall ensure that consultants retained for services pursuant to the AGREEMENT meet these standards.

VIII. DISPUTE RESOLUTION

- A. Should any signatory to this AGREEMENT, including any invited signatory, object at any time to any action proposed or the manner in which the terms of this AGREEMENT are implemented, FTA shall consult with such party to resolve the objection. FTA consultation shall take place within ten (10) days of receipt of written documentation of said objection and shall be documented in the form of meeting notes and/or a written letter of response. If FTA determines, within thirty (30) days of documenting consultation efforts with the objecting party that the objection cannot be resolved, FTA shall:
1. Forward all documentation relevant to the dispute, including the FTA's proposed resolution, to the ACHP. The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that takes into account any advice or comments from the ACHP, signatories, and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.
 2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period after receipt of adequate documentation, FTA may render a final decision regarding the dispute and proceed accordingly. In reaching its decision, FTA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the AGREEMENT and provide them and the ACHP with a copy of such written response.
 3. FTA's responsibility to carry out all other actions subject to the terms of this AGREEMENT that are not the subject of the dispute remains unchanged.

IX. AMENDMENTS

Any signatory or invited signatory to this AGREEMENT may request that it be amended, whereupon the signatories and consulting parties shall consult to consider such amendment. Any amendments shall be in writing and shall be signed by all signatories to be effective.

X. TERMINATION OF AGREEMENT

Any signatory to this AGREEMENT may terminate it by providing ninety (90) days notice to the other parties. The parties must consult with each other during the notice period in an attempt to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the FTA will comply with 36 CFR 800.3 through 800.13 with regard to the undertaking covered by this AGREEMENT.

XI. DURATION OF AGREEMENT

This AGREEMENT will terminate one year after the PROJECT enters revenue service operation or within ten (10) years, whichever comes first, or upon mutual agreement of the signatories. Prior to such time, FTA may consult with the other signatories to reconsider the terms of the AGREEMENT and revise, amend, or extend it in accordance with Stipulation IX.

XII. EXECUTION OF AGREEMENT

This agreement may be executed in counterparts.

Execution of this AGREEMENT and implementation of its terms is evidence that the FTA has afforded the ACHP a reasonable opportunity to comment on the PROJECT and that the FTA has taken into account the effects of the PROJECT on historic properties.

SIGNATORIES:

FEDERAL TRANSIT ADMINISTRATION

By: Rebecca Reed
for Marisol Simon, Region V Administrator

Date: 2/23/2012

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

By: Barbara Howard
Barbara Howard, Deputy State Historic Preservation Officer

Date: 2/28/2012

INVITED SIGNATORY:

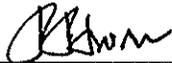
HENNEPIN COUNTY REGIONAL RAILROAD AUTHORITY

By: 
Peter McLaughlin, Chair

Date: 3/28/12

INVITED SIGNATORY:

METROPOLITAN COUNCIL

By: 
Patrick P. Born, Regional Administrator

Date: 3.6.2012

CONCURRING PARTY:

I concur with the Programmatic Agreement between the Federal Transit Administration and the Minnesota State Historic Preservation Office regarding the Interchange project in Minneapolis, MN.

CITY OF MINNEAPOLIS

By:  Date: 2-26-12
Jack Byers, Planning Manager, Community Planning and Economic Development

CONCURRING PARTY:

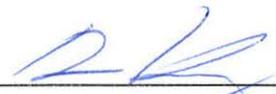
I concur with the Programmatic Agreement between the Federal Transit Administration and the Minnesota State Historic Preservation Office regarding the Interchange project in Minneapolis, MN.

MINNESOTA BALLPARK AUTHORITY

By: 

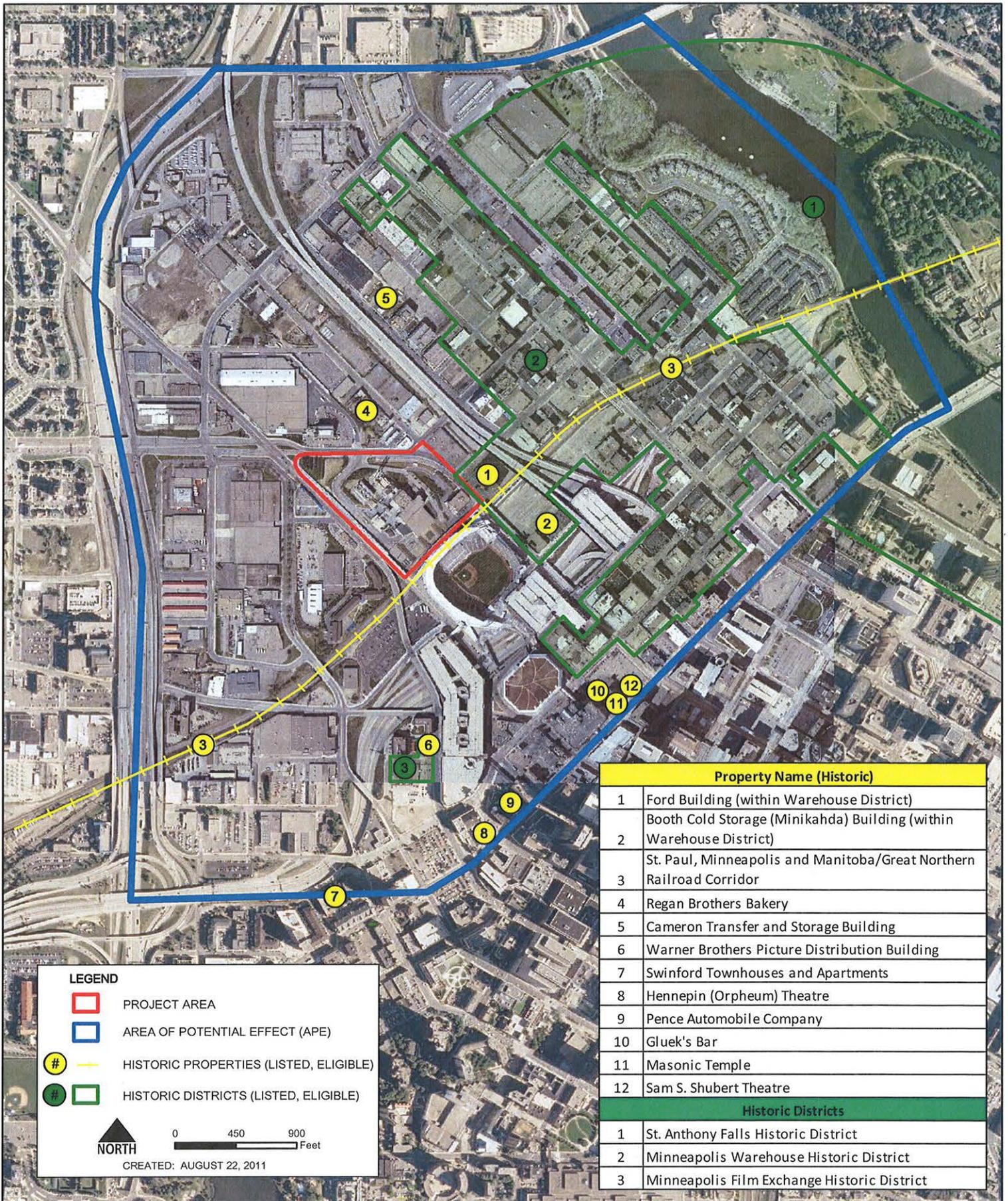
Steve Cramer, Chair

Date: 2/21/12

By: 

Dan Kenney, Executive Director

Date: 2.21.12



LEGEND

- PROJECT AREA
- AREA OF POTENTIAL EFFECT (APE)
- # HISTORIC PROPERTIES (LISTED, ELIGIBLE)
- # HISTORIC DISTRICTS (LISTED, ELIGIBLE)

NORTH

0 450 900 Feet

CREATED: AUGUST 22, 2011

Property Name (Historic)	
1	Ford Building (within Warehouse District)
2	Booth Cold Storage (Minikahda) Building (within Warehouse District)
3	St. Paul, Minneapolis and Manitoba/Great Northern Railroad Corridor
4	Regan Brothers Bakery
5	Cameron Transfer and Storage Building
6	Warner Brothers Picture Distribution Building
7	Swinford Townhouses and Apartments
8	Hennepin (Orpheum) Theatre
9	Pence Automobile Company
10	Gluek's Bar
11	Masonic Temple
12	Sam S. Shubert Theatre
Historic Districts	
1	St. Anthony Falls Historic District
2	Minneapolis Warehouse Historic District
3	Minneapolis Film Exchange Historic District

SECTION 106 PROGRAMMATIC AGREEMENT

ATTACHMENT A. AREA OF POTENTIAL EFFECT AND HISTORIC PROPERTIES

