

STATE HISTORIC PRESERVATION OFFICE

June 29, 2015

Mr. David S. Radford  
State Parks & Trails CRM Program  
MN Dept. of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155

RE: SRA.2.302.1.15, Mountain Bike Trail Project, Cuyuna Country State Recreation Area  
T46 R29 S1, 2, 11, Crow Wing County  
SHPO Number: 2015-2098

Dear Mr. Radford:

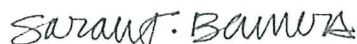
Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Based on our review of the project information, we conclude that there are **no properties** listed in the National or State Registers of Historic Places (NRHP), and no known or suspected archaeological properties in the area that will be affected by this project. However, as noted in the report, this project is located within the boundaries of the Cuyuna Iron Range Historic Mining Landscape District, which has previously been determined eligible for listing in the NRHP. We appreciate your assessment regarding impacts of this trail project on the historic district. We agree that utilization of a low-impact sustainable trail design will have minimal effects on the intact mining features and that the historic district will not be adversely affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal permit or license, it should be submitted to our office by the responsible federal agency.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance

Received

JUL - 1 2015

DNR Parks and Trails  
Central Office

MINNESOTA HISTORIC PRESERVATION OFFICE

April 13, 2017

Mr. David S. Radford  
State Parks & Trails CRM Program  
MN Dept. of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155

RE: SRA.2.302.2.16  
Cultural Resource Reconnaissance Survey – Native Soil Mountain Bike Trail Project  
Cuyuna Country State Recreation Area  
T46 R29 S9, S10, S11 and S14, Crow Wing County  
MnHPO Number: 2017-1421

Dear Mr. Radford:

Thank you for the opportunity to comment on the above project. Information received in our office on 16 March 2017 has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

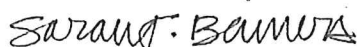
We have reviewed the cultural resources survey report *Cultural Resource Reconnaissance Survey for a Native Soil Mountain Bike Trail Project, Cuyuna Country State Recreation Area, Crow Wing County, Minnesota* (March 2017) that was prepared for this project. Based on the results of the survey, we conclude that there are no known or suspected archaeological properties in the area that will be affected by this project.

As you are aware, this bike trail project is located within the boundaries Cuyuna Iron Range Historic Mining Landscape District (District), which has previously been determined eligible for listing in the National Register of Historic Places (NRHP). Based on the information provided, it appears as though many of the features identified in the initial evaluation of this District (stockpiles, mine shafts, structures, foundations, roads and railroads), within and near the proposed project area, have been compromised due to demolition activities after the mines fell out of use. As long as all of the associated building and non-railroad grade structural remains that were identified during the reconnaissance survey are avoided, and as long as the project's impacts on the stockpiles, roads and railroad grades will be minimal and reversible as stated in the report, we concur with your determination that this project will have no adverse effect on the Cuyuna Iron Range Historic Mining Landscape District. We note that the Iron-ton Sintering Plant, which is listed in the NRHP, is located nearby but will not be visible from the proposed project. We agree with your determination that this project will have no effect on this historic property.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please contact our Compliance Section at (651) 259-3455 if you have any questions on our review of this project.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance

**Received**

APR 17 2017

**DNR Parks and Trails  
Central Office**

STATE HISTORIC PRESERVATION OFFICE

August 17, 2016

Mr. David S. Radford  
Division of Parks and Trails  
MN Dept. of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155

RE: SPK.2.302.1.16, Mountain Bike Skills Area Project, Cuyuna Country State Recreation Area  
T46 R29 S10, Crow Wing County  
SHPO Number: 2016-3168

Dear Mr. Radford:

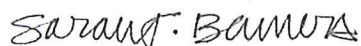
Thank you for the opportunity to review and comment on the above project. Information received in our office on 20 July 2016 has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Based on our review of the project information, we conclude that there are **no properties** listed in the National or State Registers of Historic Places (NRHP), and no known or suspected archaeological properties in the area that will be affected by this project. However, as noted in the report, this project is located within the boundaries of the Cuyuna Iron Range Historic Mining Landscape District, which has previously been determined eligible for listing in the NRHP. We appreciate your assessment regarding impacts of this project on the historic district. We agree that the project will have minimal effects on the intact mining features and that the historic district will not be adversely affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal permit or license, it should be submitted to our office by the responsible federal agency.

Please contact our Compliance Section at (651) 259-3455 if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance

  
AUG 19 2016





September 11, 2018

Mr. David S. Radford  
Division of Parks and Trails  
MN Dept. of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155

RE: SRA.2.302.1.18  
Yawkey Unit Mountain Bike Trail Project, Cuyuna Country State Recreation Area  
T46 R29 S1, Crow Wing County  
SHPO Number: 2018-2792

Dear Mr. Radford:

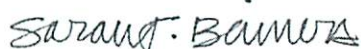
Thank you for the opportunity to review and comment on the above project. Information received in our office on 14 August 2018 has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We have reviewed the cultural resources survey report that was prepared for this project. Based on the results of the survey, we conclude that there are no properties listed in the National or State Registers of Historic Places (NRHP), and no known or suspected archaeological properties in the area that will be affected by this project. However, as noted in the report, this project is located within the boundaries of the Cuyuna Iron Range Historic Mining Landscape District, which has previously been determined eligible for listing in the NRHP. We appreciate your assessment regarding the impacts of this project on the historic district. We agree that through the utilization of low-impact sustainable trail design, that this project will have minimal effects on the intact mining features and that the historic district will not be adversely affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal permit or license, it should be submitted to our office by the responsible federal agency.

Please contact Kelly Gragg-Johnson, Environmental Review Specialist, at (651) 201-3285 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us) if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers  
Environmental Review Program Manager

June 21, 2013

David Radford  
State Parks Archaeologist  
MN Dept. of Natural Resources  
500 Lafayette Road  
St. Paul, MN 55155-4037

RE: DNR No. SRA.2.302.1.12  
Huntington Trailhead Improvement Project, Cuyuna Country State Recreation Area  
Irondale Twp., Crow Wing County  
SHPO Number: 2013-2199

Dear David:

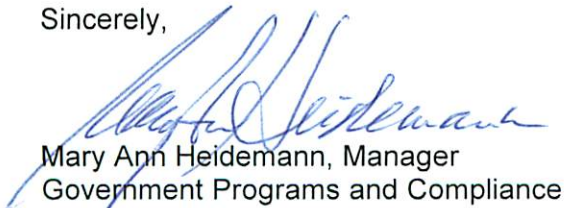
Thank you for initiating consultation on the above project. Our comments are based on the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and Field Archaeology Act.

We have reviewed the information provided on the Mahnommen Mines Rail Grade Remnant (CW-IRN-002). Thank you for filling out a survey and evaluation form for the railroad grade segment. Based on the information provided, we agree that the rail grade remnant is **not eligible** for listing in the National Register of Historic Places.

We note that a portion of the Cuyuna Iron Range Historic Mining Landscape District, which was recently determined eligible for the National Register, lies within the area of potential effect for this project. However, we agree that the project as proposed will have **no adverse effect** on the Register-eligible District.

If you have any questions on our review, please contact me at (651) 259-3456.

Sincerely,

  
Mary Ann Heidemann, Manager  
Government Programs and Compliance



**Minnesota Department of Transportation**

**Transportation Building**

395 John Ireland Boulevard  
Saint Paul, Minnesota 55155-1899

August 18, 2009

Mr. Dennis A. Gimmestad  
Government Programs & Compliance Officer  
State Historic Preservation Office  
Minnesota Historical Society  
345 Kellogg Boulevard W.  
St. Paul, MN 55101

Re: S.P. 92-090-33 (native soil mountain bike trails, Cuyuna Country State Recreation Area)  
Crow Wing County, Minnesota

Dear Mr. Gimmestad:

We have reviewed the above-referenced undertaking in accordance with our FHWA-delegated responsibilities for compliance with Section 106 of the National Historic Preservation Act (36 CFR 800) and the 2005 Section 106 Programmatic Agreement among the FHWA, the SHPO, and the USACOE.

The FHWA is providing funds to the Minnesota Department of Natural Resources, Division of Parks and Trails (DNR), to construct approximately 21 miles of mountain bike trails within the Cuyuna Country State Recreation Area (CCSRA). These trails are within the tentative boundaries of the Cuyuna Iron Range Historic Mining District, which the Mn/DOT Cultural Resources Unit (on behalf of the FHWA) has considers eligible for the National Register of Historic Places (see S.P. 18-090-01; SHPO No. 2003-1729).

The specific details of construction are contained in State Park Archaeologist Dave Radford's 7-23-09 letter report to me and its attachments (these were copied to you by Mr. Radford). The trail has been designed to cause minimal disturbance during construction and to minimize erosion. The trail treadwidth will average four feet, but may be expanded up to five feet in some areas. There will be limited cutting and filling, and the trail will have a compacted native soil surface. Grubbing of secondary growth vegetation will be required along the trails to varying degree; typically, cleared areas will extend two feet to either side of the trail (for a typical cross section, see Sheet 4 of the draft review plans attached to the 7-23-09 letter from Radford to Abel). The principal equipment to be used in building the trail will be a four- to five-foot walk-behind dozer (see Sheet 12 of the draft review plans).

The CCSRA is currently used for recreational purposes; therefore, we do not believe that the introduction of mountain bike trails will affect an area larger than the proposed trail construction corridor. The project area of potential effects (APE) includes 25 feet to either side of the trail centerline. There are no known archaeological resources within the project APE. The land to be used for the trails has been intensively disturbed by historical mining activities and is unlikely to contain intact and significant precontact archaeological resources. The proposed trails fall within

the tentative boundary of the Cuyuna Iron Range Historic Mining District, considered eligible for the National Register of Historic Places, and within the National Register boundary of the listed Ironton Sintering Plant (see Figure 5 attached to the 7-23-09 letter from Radford to Abel). In addition, the trails will be built in the vicinity of the Croft Mine (CW-CSC-015).

#### MnDNR Review

State Park Archaeologist Dave Radford completed a limited review of the archival materials pertinent to this undertaking as well as several field surveys. Mr. Radford identified several areas within the project APE where cultural features related to mining are known or are likely to be found. As described in his 7-23-09 letter report to me, Mr. Radford field surveyed these areas and recorded any cultural features present with a Trimble Pro XR GPS unit. This information resulted in the rerouting of the proposed trails in some areas to avoid mining features (the GIS data has been forwarded to Brauer and Associates, who are preparing the construction plans for this project). The trail in the vicinity of the National Register-listed Ironton Sintering Plant will skirt the eastern edge of the property along the snowmobile route reviewed by our office in 2003 (SHPO No. 2003-1729). In the vicinity of the Croft Mine, the proposed trail alignment will be routed well northwest of the identified historic features, and we concur with Mr. Radford that the trails will not adversely affect visual or auditory characteristics of these sites.

#### Need for a Historic Context

Because the Cuyuna Iron Range Historic Mining District has not been the subject of a comprehensive study, not much is known about the specific features it contains or their historic context, other than that many are unique historical resources. The Works Projects Administration's *The Cuyuna Range: A History of a Minnesota Iron Mining District* (Anna Himrod, The Minnesota Historical Records Survey Project, 1940) is a helpful source for understanding the history of the Cuyuna Range up until its date of publication, but does not cover the World War II or post-war eras on the range. A well-developed historic context for the Cuyuna Iron Range is well beyond the limited scope of the present undertaking. However, the archival materials identified through Mr. Radford's efforts provide a solid foundation on which to develop a historic context that would be extremely useful in future CCSRA planning and management decisions as well as environmental reviews.

#### Finding

Mr. Radford made several recommendations in his 7-23-2009 letter report regarding additional measures to ensure that the trails do not impact any cultural resources. These conditions are:

1. The contractor will attend a preconstruction meeting with MnDNR staff and an archaeologist from the Minnesota State Park Cultural Resource Management Program. The archaeologist will give a presentation at the meeting on the historical significance of the project area and show the contractor mining features in the field so they can recognize them.
2. The construction plans will indicate that if the contractor encounters historic features, they will stop ground disturbance in the area and contact the project manager or the archaeologist assigned to the project. The contractor will avoid working in that area until

clearance is given based on a field assessment by the archaeologist assigned to the project.

3. The contractor will inform the archaeologist assigned to the project of any significant changes in trail alignments and such changes must be approved by the archaeologist prior to construction.
4. The archaeologist assigned to the project will be available to monitor construction on an as-needed basis. In addition, CCSRA Manager Steve Weber, who is familiar with many of the area's cultural features based on extensive experience at the CCSRA, will be closely reviewing construction in the field and will be available to be of assistance as needed.

*Provided the above measures are carried out, we concur with Mr. Radford's recommendation that the proposed bike trails will have **no adverse effect** on the National Register-eligible Cuyuna Iron Range Historic Mining District or the National Register-listed Ironton Sintering Plant. Although not a condition of our finding, we also concur with Mr. Radford's recommendations that the historic mining resources within the CCSRA provide excellent opportunities for the MnDNR to interpret the unique history of Cuyuna Range mining to trail and other recreation area users. We look forward to your response within 30 days of your receipt of our letter. Please call me at 651-366-3604 or email me at [elizabeth.abel@dot.state.mn.us](mailto:elizabeth.abel@dot.state.mn.us) if you have any questions.*

Sincerely,



Elizabeth J. Abel  
Historical Archaeologist/Historian  
Cultural Resources Unit (CRU)

cc: Teresa Thews, MnDNR  
Dave Radford, MnDNR  
Joe Hudak, Mn/DOT CRU  
Mn/DOT CRU Project File  
Mn/DOT CO File



**From:** [Radford, Dave S. \(DNR\)](#)  
**To:** [Johnson, Bill H. \(DNR\)](#)  
**Subject:** cuyuna shpo responses for trail work in the past  
**Date:** Thursday, January 03, 2019 4:03:11 PM  
**Attachments:** [Cuyuna MnDOT Letter SP92-090-33 Cuyuna mtn bike trls SHPO ltrr.pdf](#)  
[cuyuna Huntington Trailhead Improvement Project SHPO Response.pdf](#)  
[cuyuna country mountain bike trails SHPO response.pdf](#)  
[Cuyuna Country SRA Native Soil Mountain Bike Trail SHPO Response 2017-1421.pdf](#)  
[Cuyuna Country SRA Skills Area SHPO Response.pdf](#)  
[cuyuna country sra-yawkey trails 2018-2792.pdf](#)

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All SHPO and MnDOT Letters should be here except Sagamore Unit work which is ongoing.

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David Radford  
Program Manager  
Cultural Resource Management Program  
MnDNR, Division of Parks and Trails  
500 Lafayette Road  
St. Paul, MN 55155-4039  
651-259-5604 office  
651-297-1157 fax  
[dave.radford@state.mn.us](mailto:dave.radford@state.mn.us)