

August 16, 2018

Jennifer Tworzyanski  
Archaeology Department  
Minnesota Historical Society  
Historic Fort Snelling  
200 Tower Avenue  
St. Paul MN 55111

RE: Minnesota Valley State Trail – Bloomington Segment (13.1 Mile Corridor)  
Bloomington, Hennepin County  
SHPO Number: 2018-2506

Dear Ms. Tworzyanski,

Thank you for the opportunity to comment on the above project. Information received in our office July 17, 2018 has been reviewed pursuant to the responsibilities given to the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and the Minnesota Field Archaeology Act (Minn. Stat. 138.40).

We have completed a review of your letter dated July 13, 2018, a submittal which included the survey report entitled *Minnesota Department of Natural Resources, Parks and Trails Cultural Resources Program: Trails and Waterways Unit Project Survey Report, Minnesota Valley State Trail. Bloomington Ferry to USFWS* (Minnesota Historical Society Archaeology Department, June 2018). Our comments and recommendations are provided below.

**Proposed Project**

Based upon information submitted to our office, it is our understanding that the Minnesota Department of Natural Resources (MnDNR), utilizing state bond funding, proposes to construct a new 13.1 mile long segment of the Minnesota Valley State Trail in the City of Bloomington, Hennepin County. Your report also indicates that construction of the trail will require a wetland permit from the U.S. Army Corps of Engineers (USACE) and that the proposed trail alignment crosses U.S. Fish & Wildlife Service (USFWS) property. The report is not clear as it pertains to the USACE jurisdiction and whether the trail is entirely or partially within USFWS property.

Because neither federal agency has initiated Section 106 consultation with our office regarding the proposed federal undertaking(s), this current review by our office is pursuant to our responsibilities under state statutes only.

In order to complete a review under Section 106 of the National Historic Preservation Act, the lead federal agency will need to initiate consultation with our office and others pursuant to 36 CFR Part 800. Alternatively, a federal agency may authorize an applicant for federal assistance to initiate Section 106 consultation with our office pursuant to 36 CFR 800.2(c)(4). If the latter option is taken by the federal agency, then written notification of this authorization will need to be provided to our office and other consulting parties.

Pursuant to 36 CFR 800.3-5 it is the responsibility of the Federal agency, or delegated federal agent, in consultation with our office and others, to:

- define the federal undertaking subject to review under Section 106
- determine and document the area of potential effect (APE) for the federal undertaking
- identify and evaluate historic properties that may be affected by the proposed federal undertaking, and
- assess adverse effects to historic properties, if any.

### **Archaeology**

We agree with the results of the archaeological report in terms of how the area of potential effect for the state project has been determined, characterized as “equivalent to construction limits” of 30-50 feet wide, and how the survey and identification of archaeological sites has been undertaken and completed.

We also agree with the report’s identification of several archaeological sites are located outside the currently-defined area of potential effect, and determinations that impacts to recently identified archaeological sites will be avoided as part of the trail construction and that the likelihood of the proposed project impacting intact archaeological sites is low. Our agreement is based upon information and documentation provided in the June 2018 report and we assume that project construction plans, which we have not had the opportunity to review, have been developed in accordance with the report’s recommendations. In order to ensure that these conditions will be met, we request the opportunity to review construction plans in accordance with Minn. Stat. 138.40 Subd. 3.

### **Historic/Architectural**

The report indicates that the area of potential effect for consideration of historic/architectural properties has been determined to be an area of 200 feet on either side of the proposed trail. The report has very limited information included in regards to the characteristics of the proposed trail. We can only discern from the report that the trail will be paved and it will require minimal subsurface cutting. The report does not provide information in regards to the proposed width of the trail or descriptions of any other trail infrastructure that may be installed including signage, benches, waysides, parking/rest areas, etc. In order for our office to have a better understanding of whether the proposed 400 foot wide area is appropriate, we request additional information as it pertains to the scope and nature of the proposed trail construction. This can be provided with additional narrative and construction plans, as well as detailed project maps.

We agree with the survey report’s findings there are no historic properties which are already listed in the National or State Registers of Historic Places within the currently-defined area of potential effect.

We have reviewed the results of the Phase II intensive level survey and evaluation of the following historic/architectural properties and our comments are provided below.

- **William Chambers House (HE-BLC-053)** – is a historic property eligible for listing in the National Register of Historic Places (NRHP) under Criteria A, B, and C, with a recommended period of significance from 1856 to 1883;
- **Minneapolis, St. Paul, Rochester & Dubuque Electric Traction Company “Dan Patch Electric Line”/Minneapolis, Northfield & Southern Railway/Soo Line/Canadian Pacific/Twin Cities &**

**Western Railroad Corridor Historic District (HE-RRD-003)** – is a historic property eligible for listing in the NRHP under Criteria A and C (to include swing bridge), with a recommended period of significance of 1915 to 1968.

- **Minneapolis, St. Paul, Rochester & Dubuque Electric Traction Company “Dan Patch Electric Line”/Minneapolis, Northfield & Southern Railway/Soo Line/Canadian Pacific/Twin Cities & Western Railroad Swing Bridge (HE-BLC-057)** – is a historic property eligible for listing the NRHP as a contributing property within the railroad corridor historic district.

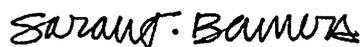
The survey report indicates that all properties over 50 years old within the 400 foot area of potential effect were “documented with photographs and field notes.” While this may be sufficient for a state-level review, it will be important as part of any future Section 106 review to provide any Phase I reconnaissance level survey results to our office for review and comment and this would include survey of any properties determined not eligible for listing in the NRHP.

Unfortunately, while the report provides narrative recommendations that the proposed trail will not be visible or otherwise adversely affect the historic properties identified above, we do not feel that we have been provided sufficient documentation in support of these findings. The project construction plans and other map documentation, as requested above, and any additional narrative description of proposed project work specific to the areas in which these properties are located, will provide the documentation we typically need to complete our review.

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, 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 license or permit, it should be submitted to our office by the responsible federal agency as indicated above.

Please feel free to contact me at (651) 201-3290 or [sarah.beimers@state.mn.us](mailto:sarah.beimers@state.mn.us) if you have any questions regarding this comment letter.

Sincerely,



Sarah J. Beimers  
Environmental Review Program Manager

*Cc via email only:*

Miranda Van Vleet, Minnesota Historical Society