



July 22, 2011

Mr. Eric Hesse Liesch Associates, Inc. 13400 15th Avenue North Minneapolis, MN 55441

Re: Diamond Products Site Historical Review

Dear Mr. Eric Hesse:

Per your request, Summit Envirosolutions Inc. (Summit) has conducted a historic resources review and assessment for the former Diamond Products building (Project) for the Saint Paul Port Authority (SPPA). The assessment was prepared by Renée L. Hutter, who meets the Secretary of the Interior's Professional Qualification Standards in architectural history, and Laurie H.S. Ollila, who meets the Standards in archaeology. Summit completed a historic resources assessment of the National Register of Historic Places (NRHP)-listed Lowertown Historic District within the Project area of potential effects (APE) for indirect effects. Because the former Diamond Products building is located directly east of the district boundaries, a visual assessment survey of the site in relation to the buildings within the boundaries was conducted. Summit also completed an assessment of the Project area for its potential to contain intact archaeological deposits, based on a literature search and visual assessment.

PROJECT DESCRIPTION

The historical and archaeological assessments were prepared for a portion of the former Diamond Products property, located at 310 5th Street East, Saint Paul, Ramsey County, Minnesota. The property is being considered as a potential site for a new regional baseball park. The SPPA, on behalf of the City of Saint Paul, is conducting due diligence investigations regarding potential environmental issues, including cultural resources. In its entirety, the Diamond Products site consists of approximately 21 acres and includes a manufacturing facility, a distributing facility, and parking. The portion of the property the SPPA is planning to purchase is approximately 7 to 8 acres in size and includes a 600,000 square foot office and manufacturing plant and portions of surface parking lots.

AREA OF POTENTIAL EFFECTS (APE)

For indirect effects, the APE includes the area in which the setting of a historic property may be diminished by the construction of a modern ballpark. Because the project area is in a dense urban area dominated by high-rise buildings, the APE is limited to no more than two blocks from the Diamond Products site. The APE for the Diamond Products building is roughly bounded by East 7th Street on the north and East Kellogg Boulevard on the south, Wacouta Street on the west and Layfayette Freeway on the east (Figure 1). The APE encompasses the area within the proposed project construction limits, as well as a buffer around the construction limits to account for

indirect effects, including changes in visual qualities and noise levels for surrounding properties. The UTM coordinates (NAD 83) for the APE for indirect effects are Zone 15, north end: E 493146 N 4977594, south end: E 493458 N 4977279, west end: E 493196 N 4977355, east end: E 493538 N 4977520.

The APE for direct effects for this project is defined as being commensurate with new construction limits. New construction limits for this project comprise the current location of the Diamond Products building; portions of East 5th Street, Pine Street, Olive Street, and John Street; the parking lots located immediately north and east of the existing Diamond Products building; and an existing dog park and open grassy area located northwest and northeast of the Diamond Products building, respectively (see Figures 1 and 6).

LITERATURE SEARCH

Methods

Summit obtained a list of previously recorded archaeological sites and architectural history properties in the vicinity of the Diamond Products building from the SHPO database. In addition to general property location information, this database contains information regarding whether a particular property is currently listed in the National Register of Historic Places (NRHP), has been determined eligible for listing in the NRHP through a consensus determination, or is considered eligible for listing in the NRHP through previous findings by SHPO staff. Based on the list of sites and properties, Summit staff reviewed relevant archaeological site files and architectural history inventory forms. Historical maps and aerial photographs were reviewed along with current topographic maps to assess the potential of the project area for containing precontact or historical-period archaeological resources. In addition, Summit staff reviewed current photographs of the project area

Results

The APE for direct effects is located within the Lowertown neighborhood, which is situated east of downtown St. Paul and just north of the Mississippi River. A brief history of the early development of St. Paul and the Lowertown neighborhood is provided below:

Historic Context

Despite the establishment of Fort Snelling in the 1820s, the settlement in the area around present-day St. Paul was not permitted by the U. S. Government until the Treaty of 1837. Taking advantage of the transportation afforded by the Mississippi River, St. Paul's earliest settlers took up claims along the waterway. By the 1840s, settlement was concentrated in the area that would become downtown St. Paul, due to the level terraces which were excellent sites for steamboat landings. With the establishment of the Minnesota Territory in 1849 and the creation of Ramsey County later that year, even more settlers flooded into the area by way of steamboat along the Mississippi River (Schmidt and Hutter 2010:7-8).

Lowertown emerged during the mid nineteenth century near the Lower Landing, the area's first steamboat docking area along the Mississippi River (Murphy and Granger 1981:1; Zellie and Peterson 2001b:4; Millett 2007:344). The current project area is situated within the Kittson Addition, which was developed in the southeast corner of Lowertown in 1851, and named after Norman Kittson, a territorial legislator, fur trader, and St. Paul mayor (Murphy and Granger 1981:4; Zellie and Peterson 2001c:3). Lowertown was initially composed primarily of private residences, many of which were occupied by French Canadian, Indian, and Swiss settlers that had

been driven from Fort Snelling in 1840. These settlers engaged in farming, fur trading, and support of riverboat crews and Red River ox cart drivers (Murphy and Granger 1981:1).

During the 1860s, railroad tracks were laid in the Trout Brook and Phalen Creek valleys along the eastern edge of Lowertown (Murphy 1981:89; Murphy and Granger 1981:1). Although a successful commercial district had already begun to emerge within Lowertown by this time, the arrival of the railroads, combined with nearby river access, transformed the area into a thriving commercial and warehousing district (Millett 2007:344).

By the mid 1870s, commercial expansion and railroad construction began to displace local residents, who sought refuge in areas such as Irvine Park in Uppertown. Commuting was made considerably easier with the establishment of the city's first horsecar line in 1872, which originally spanned from Lowertown to just west of downtown St. Paul (Murphy 1981:88; Murphy and Granger 1981:3; Zellie and Peterson 2001a:4).

Manufacturing and wholesale businesses boomed in Lowertown during the 1880s and 1890s. Between 1881 and 1891, for example, manufactured goods in the city increased over 300 percent, from \$5.4 million to \$61.2 million, respectively, and "built a new economy for St. Paul" (Zellie and Peterson 2001b:7). Early divisions of industry giants, including Hormel and Armour Foods, had facilities located within Lowertown during this period. By 1921, all traces of its residential roots had been removed (Sanborn Map Company 1903, 1910, 1925, 1926, 1951, 1956, 1969; Zellie and Peterson 2001b:14, 23).

Lowertown continued to serve as a major center of warehousing and distribution through the 1950s, though the Great Depression and World War II restricted its growth during those years (Zellie and Peterson 2001b:20). By the 1960s, the area had fallen into decline. Revitalization efforts of the neighborhood began in the 1970s, and Lowertown has since been reinvented as an urban village (Murphy and Granger 1981:8; Millett 2007:344).

Previous Surveys

No archaeological surveys have been previously conducted within the APE for direct effects.

Previously Identified Sites and Archaeological Potential

No precontact archaeological sites have been previously recorded within the project area. Two precontact archaeological sites, 21RA05, and 21RA28, have been previously recorded within one mile of the project area (Table 1). Site 21RA05 (Dayton's Bluff) comprises a cluster of 19 Early Woodland mounds situated along a bluff edge overlooking the Mississippi River in the NE ¼ of the NE ¼ of the NE ¼ of Section 5, T28N, R22W, and the SE ¼ of the SE ¼ of Section 32, T29N, R22W, approximately 3,100 feet (0.59 mile) east-southeast of the project area. Site 21RA28, Dayton's Bluff Cave, is located approximately 3,300 feet (0.63 mile) southeast of the project area in the center of the SW ¼ of the SE ¼ of the SE ¼ and the NE ¼ of the SW ¼ of the SE ¼ o

Another cave that historically contained petroglyphs, Site 21RA27 (Carver's Cave), is located in the SW ¼ of the SE ¼ of the SE ¼ of Section 32, T29N, R22W, approximately 3,800 feet (0.72 mile) southeast of the project area (see Table 1). The cave was also utilized by early European explorers, including Jonathan Carver in 1766 and 1767, and served as an important focal point for subsequent visitors to the area.

The topographic map of the project area indicates that it is situated upon a terrace approximately 800 feet (0.15 mile) north of the historic northern bank of the Mississippi River as depicted on the original General Land Office survey map of the project area dating to 1856. Based on its topographic relationship and proximity to the river, as well as its proximity to the previously recorded sites, the project area is considered to have moderate to high potential for containing precontact archaeological resources.

Current photographs of the project area indicate that its southern half is occupied by the extant Diamond Products building, while the northern half contains bituminous parking lots. Various construction and grading episodes in these areas over the past 160 years would have caused significant enough disturbance to the project area to make it unlikely that any potential precontact archaeological resources would remain intact.

No historical-archaeological sites have been previously recorded within the project area. Fourteen historical-archaeological sites, 21RA14, 21RA20, 21RA30, 21RA32, 21RA35, 21RA36, 21RA37, 21RA38, 21RA39, 21RA45, 21RA47, 21RA48, 21RA49, 21RA50, have been previously recorded within one mile of the project area (see Table 1). These sites, which include artifact scatters, structural ruins, and/or standing structures associated with historical residential, commercial, and/or industrial sites, are located approximately ¼ to 1 mile from the APE for direct effects. These sites are at a sufficient distance that associated resources would not be present within the project area.

Historical maps of the project area that depict buildings date to 1856, 1857, 1874, 1885, 1890, 1903, 1910, 1925, 1926, 1951, 1956, and 1969. No buildings are illustrated within the project area on the GLO map dating to 1856, though the 1857 map indicates that the area had been platted for residential development (GLO 1856; Belden 1857; Andreas 1874). The 1874 map of the project area also shows the APE to be platted, but specific building details are not provided (Andreas 1874).

As of 1885, the northwest quarter of the project area contained several residences, two boarding houses, and an ice house. An additional private residence, a set of tenements, and a coal shed were present to the east. The southwest corner of the project area contained private residences, as well as a boiler shop, cigar factory, roofing area, blacksmith shop, and a horse shed. In the southeast portion of the APE, various elements of the St. Paul Gas Light company, including retorts, coal sheds, gasometers, and purifying houses had been constructed. Immediately east of the St. Paul Gas Light company property, more residences and the St. Paul Paint Workshop were present. The project area was traversed by northwest-to-southwest-running segments of Pine Street, Olive Street, and John Street, and by southwest-to-northeast-running segments of East 4th Street, East 5th Street, and East 6th Street (Figure 2) (Sanborn Map Company 1885).

Within the next five years, the single residence in the northeast corner of the project area and the residential areas in the southwest quarter of the APE were replaced with an additional coal and storage shed and a gasometer, as well as wholesale grocery, respectively. A single residence was erected east of the gasometer on the east side of John Street, and a Water Gas Plant was constructed in the former location of St. Paul Gas Light Company coal sheds in the northeast corner of the project area (Sanborn Map Company 1890).

Table 1. Previously Identified Archaeological Sites Within One Mile of the Direct Effects APE

Site No. (Name)	Township	Range	Section	1/4 Section	Site Description	Context
21RA05 (Dayton's Bluff)	T28N	22W	5	NE1/4NE1/4 NE1/4NE1/4	Mbund group	Early Woodland
	T29N	R22W	32	SE1/+SE1/4		
21RA14 (OMSt. R&P Freight House)	T28N	22W	5	SW1/4NW1/4-NW1/4	Artifact scatter/Structural remants	Railroad & Agricultural Development
21RA20 (Diarmond Joe Freight House/Depot)	: T28	22W	5	SW1/4 NW1/4-NW1/4	Artifact scatter/Structural remants	Railroad & Agricultural Development
21RA27 (Carver's Cave)	T29N	R22W	32	SW1/+SE1/+ SE1/-SE1/4	Rock art & Traditional Cultural Property	Multicomponent (Precontact, Contact, Post-contact) Periods
21RA28 (Dayton's Bluff Cave)	T29N	R22W	32	C-SW1/+SE1/+SE1/4, NE1/+ SW1/+SE1/+SE1/4	Rock art	Precontact (unknown)
21RA30 (Central State Capitol Mall)	T29N	R22W	31	SW1/4-NW1/4-NE1/4, SW1/4 NE1/4-NW1/4	Structural remants	Urban Centers
21RA32 (Washington St. Residential District)	T28N	R22W	6	NE1/4SW1/4-SE1/4NW1/4	Artifact scatter/Structural remnants	Urban
21RA35 (St. Paul Glass Co. Paint Warehouse)	T28N	R22	6	NE1/+NW1/4-NE1/+SW1/4	Artifact scatter/Structural remants	Urban Center
21RA36 (Dahl House)	T29N	R22	31	SE1/4NE1/4-NE1/4SW1/4	Artifact scatter/Structural remants	Urban Center
21RA37 (Osborne Foundary/Old Brewery)	T28	R22	6	SW1/4SE1/4NW1/4	Artifact scatter/Structural remnants	Urban Center
21RA38 (Lot 5)	T29N	R22W	31	SW1/4NW1/4-NW1/4SE1/4	Artifact scatter/Structural remants	Urban
21RA39 (Lowertown Neighborhood)	T29N	R22W	31	NE'/+SE'/+NE'/+SW'/4 NW'/+SW'/+NW'/+SE'/4 SE'/+NE'/+NE'/+NE'/+SW 1/4; SW'/+NW'/+NW'/+SE 1/4		Urban
21RA45 (Harriet Island)	T28N	R22W	6	SE1/4-SW1/4 SE1/+NE1/+ SW1/4, NW1/4-SE1/4	Artifact scatter/Structural remants	Urban Centers
21RA47 (Armstrong House Relocation 7)	T28N	R22W	6	SW1/4-SW1/4-SE1/4-NW1/4	Artifact scatter/Structural remants	Urban Centers
21RA48 (North Star Brewery)	T29N	R22W	32	W½-SE¼-SE¼; E½- SW¼-SE¼	Structural remnants	Urban Centers/Early Agricultural & River Settlement
21RA49 (The Dakotah/Washington House Hotel)	T28N	R22W	6	SE1/+NW1/+NW1/4	Artifact scatter/Structural remnants	Urban Centers/Early Agricultural & River Settlement
21RA50 (Schnelle)	T28N	R22W	6	SE1/+NW1/+NW1/4	Artifact scatter/Rock alignment	Urban Centers/Early Agricultural & River Settlement

By 1903, the St. Paul Gas Light Company had expanded its property westward to accommodate a new purifying house. The ice house and residential housing located in the northwest and north-central portions of the project area were replaced with components of Armour Packing Company and Swift & Company, including offices, cold storage and shipping rooms, and a stable. A fish wholesaler was established in the former location of residential housing in the southwest corner of the project area, and the boiler works had acquired the residential property on its east side. A shoe factory and machine shop were established in the southwest and south-central portions of the APE, respectively. In addition, southwest-to-northeast-running switch tracks and railroad siding were laid through the northwest quarter of the project area, and the entire eastern edge of the APE was cleared to accommodate components of the Northern Pacific Railroad (Sanborn Map Company 1903).

Between 1903 and 1910, expansion of the St. Paul Gas Light Company continued westward, including the construction of a gasometer and equipment rooms in the former location of the boiler works, and the removal of most of the public and private residences in the northwest and north-central portions of the project area to accommodate an additional purifying house and generators. East of the St. Paul Gas Light Company property, the Northwestern Fuel Company Yard No. 1 was established, complete with additional railroad tracks, two offices, scales, and a coal shed. Another meat packing company (Cudahy Packing Co.) had also constructed a storage room immediately west of the Armour Packing Company shipping room during this period (Figure 3) (Sanborn Map Company 1910).

By 1925, all remaining residential structures had been removed within the project area, and additional warehouse facilities, including those associated with Geo. A Hormel & Company, Ratz & Hertz, and John Morrell & Company, had been erected within the northwest quarter of the project area. In addition, the shoe factory had been replaced with a plumbing supply company, the Armour Packing Company shipping room had been acquired by Hertz & Ruekin. A pipe shed and platform belonging to the Crane Ordway Company appear on the map along the eastern edge of the APE, though neither these structures nor the aforementioned coal shed associated with the Northwestern Fuel Company appear on the 1926 map of the project area (Sanborn Map Company 1925, 1926). The 1926 map also indicates that by that date, the St. Paul Gas Light Company had been renamed to "Northern States Power Company," and the coal shed associated with the power company had been replaced with a coke storage area (Sanborn Map Company 1926).

Little changed in the project area over the next 30 years, with the exception of the acquisition of the Hormel and Ratz & Hertz facilities by the John Morrell & Company, the construction of a filling station in the northwest corner of the APE, and the removal of the railroad scales and a railroad office by 1951. By 1956, the coke storage area was also removed (Sanborn Map Company 1926, 1951, 1956). By 1969, the entire southern half of the project area, including portions of East 4th Street, had been cleared to accommodate the Toni Company, a division of the Gillette Company. The gasometer located in the northeast corner of the project area had also been removed, and the location of the Cudahy Packing Company was occupied by Peters Packing Company, Inc. The warehouse facilities situated in the north-central portion of the APE had been razed to accommodate a parking lot. Other changes include the removal of the remaining railroad office, filling station, and all components of Swift & Company; ownership of the remaining cold storage area along the northwestern edge of the project area had been transferred from John Morrell & Company to Pabst Meat Supply Company; and the segment of East 6th Street located within the project area had been removed following the construction of Interstate 94 (I-94) (Figure 4) (Sanborn Map Company 1969).

A review of historical aerial photographs dating to 1923, 1940, 1947, 1953, 1957, 1966, 1972, 1978, 1985, and 1996 indicates that sometime between 1972 and 1978, the entire northern half of the project area, including the areas containing facilities associated with Armour & Company, Peters Packing Company, Inc., and Pabst Meat Supply Company, as well as the areas formerly containing the coke storage area, gasometer, and railroad tracks to the east, were razed. The entire northern half of the APE for direct effects was converted into parking lots, except for the northeastern most corner of the project area, which became overgrown (Figure 5). Between 1985 and 1996, a small segment of an existing parking lot located along the northwestern edge of the project area was removed and planted with trees.

Based on the historical presence of numerous residential, commercial, and industrial components within the APE for direct effects, the project area is considered to have high potential for containing historical-archaeological resources.

There is potential for intact subsurface historical-archaeological features associated with the commercial, industrial, and railroad facilities that were present from pre-1885 through 1969 beneath the parking lots, dog park, and grassy area in the northern half and eastern edge of the project area. If excavation will take place in these locations, it is recommended that a Phase I archaeological investigation of these portions of the project area be conducted to identify the likelihood of archaeological resources to remain intact and assess their potential significance if present, based on NRHP criteria. Depending on the results of the Phase I investigation, Phase II testing may also be recommended. Such investigation may include archaeological monitoring of backhoe trenching and/or geological coring. Photographic and written documentation of area stratigraphy and any identified archaeological features should also be completed. Site management recommendations can then be provided upon review of investigation results.

There is also potential for intact remains of the former Northern States Power Company, Water Gas Plant, and plumbing supplies company to be present beneath the existing Diamond Products building. If this building is to be removed, it is recommended that its demolition be monitored by an archaeologist to determine if subsurface cultural deposits are present.

Architectural History Properties

The literature search revealed one previously recorded NRHP-listed historic district within the APE for indirect effects: The Lowertown Historic District is listed on the National Register of Historic Places and is significant at the state level

"as the site of the Lower Landing, a steamboat docking area established when St. Paul was an important port due to its strategic location at the highest navigable point of the Mississippi, as an early residential neighborhood which as the home of many of the city's most influential citizens, as the nucleus of thirteen railroad lines which linked Minnesota with the United States and Canada, and as the city's warehouse and wholesaling district which was built up during the late nineteenth and early twentieth centuries when St. Paul was a major distribution and jobbing center for the upper Midwest. Lowertown is architecturally significant for its remarkably intact concentration of commercial buildings designed by the city's most prominent architects in styles ranging from the Italianate style of the early 1880s to the Beaux Arts of the early twentieth century. Lowertown is also significant in the history of landscape architecture and city planning due to dramatic street pattern and grade changes which were made in the 1870s, and due to the fact that a park encompassing an entire city

block has been preserved since the 1880s in the midst of a larger warehouse and industrial area with tightly clustered buildings (Murphy and Granger 1981)."

FIELD SURVEY

Methods

A preliminary visual assessment of the APE for direct effects was conducted in June of 2011. Fieldwork and preparation of the final report with recommendations were accomplished or supervised by a professional archaeologist meeting the standards set forth in 36 CFR 61.

During a site visit, the Summit architectural historian viewed the Diamond Products Building from historic properties within the Lowertown Historic District for indirect effects in order to assess potential changes to their historic setting. Architectural survey fieldwork and preparation of this report were completed by Renée L. Hutter, who meets the standards for Historian and Architectural Historian set forth in 36 CFR 61

Results

The project area is bound to the north by I-94, to the west by Broadway Street, to the south by M. Rasoir Ltd./C/O Priese Law Firm facilities (currently under construction), and to the east by State Highway 52. At the time of survey, the southern half of the project area contained the extant Diamond Products building, and the western half of the northern half of the project area contained a wooded dog park, segments of East 5th Street, Pine Street, and Olive Street, and bituminous parking lots. The eastern edge of the APE also contained parking lots, as well as a segment of John Street (Figure 6). No archaeological materials were identified within these portions of the project area.

The eastern half of the northern half of the project area was primarily occupied by bituminous parking lots, with the exception of a small, grassy area along the northeastern edge of the APE. A partial concrete foundation was identified in the north-central portion of the project area adjacent to one of the parking lots (see Figure 6). The irregularly-shaped wall is situated near the north end of Olive Street and oriented on a southwest-to-northeast axis in alignment with the northern edge of a parking lot (Figure 7). The foundation segment measures approximately 15 meters (49 feet) long and 2 meters (6.5 feet) high. Deterioration of the exposed southern wall surface revealed a rough interior concrete base covered in a cement-rich veneer (Figure 8). The practice of the application of multiple layers of concrete in an effort to provide a finished, weather-resistant outer surface was common during the early twentieth century (Gaudette and Slaton 2007:6-7). The foundation remnant appears to be currently serving as a makeshift retaining wall for the grassy embankment located immediately to the north.

The foundation appears to be near the location of the northwest corner of the coal shed as depicted on Sanborn insurance maps of the project area dating from 1885 through 1925, and the northwest corner of the coke storage area, which is illustrated on Sanborn maps dating to 1926 and 1951 (Sanborn Map Company 1885, 1890, 1903, 1910, 1925, 1926, 1951). It is also in proximity to the south end of a small structure that appears immediately north of the project area on Sanborn maps dating from 1885 to 1910 (Sanborn Map Company 1885, 1890, 1903, 1910). It is unclear at this time which of these structures the foundation represents, though its construction technique suggests a likely association with the coke storage area.

If actions are proposed that will have a potential effect on the foundation, further archaeology work is recommended to record the foundation as an archaeological site and evaluate its eligibility for listing in the NRHP.

Lowertown Historic District

The Lowertown Historic District is a 16 block area located east of downtown St. Paul and north of the Mississippi River. The district contains 41 buildings centered around Mears Park. The district is roughly bounded by East 7th Street on the north, Broadway Street on the northeast, John Street on the southeast, Kellogg Boulevard on the south, and Sibley Street on the west. The buildings in the district date from the 1880s to 1910, and most were built as warehouse and wholesale houses for businesses dependent on the railroad for shipping and receiving. During the site visit it was determined that the Diamond Products building could be seen from ten buildings within the district (Figure 9).

- #18, St. Paul Rubber Company, 300 East 4th Street, contributing to the district (Figure 10)
- #15, Northern Pacific Railway Warehouse, 308 Prince Street, contributing to the district (Figure 11)
- #8, Tighe Building, 364-383 Broadway Street, contributing to the district (Figures 12 and 13)
- #28, 281-287 East 5th Street, contributing to the district (see Figure 12)
- #33, J. H. Allen Building, 287 East 6th Street, contributing to the district (Figure 14)
- #9, Allen Building Annex, 417 Broadway Street, contributing to the district (Figure 15)
- #29, 282 East 6th Street, contributing to the district (Figure 16)
- #27, Rayette Building, 261-279 East 5th Street, contributing to the district (Figure 17)
- #21, Chicago, St. Paul, Minneapolis and Omaha Railroad Office Building, 275 East 4th Street, contributing to the district (Figure 18)
- #7, Engine Company No. 2, 412 Wacouta Street, contributing to the district (Figure 19)

The Lowertown Historic District is listed under Criterion A for its association with the early establishment of a warehouse and wholesaling district in St. Paul, built during the late nineteenth and early twentieth centuries when the city was a major distribution and employment center in the Midwest. It is also listed under Criterion C as an intact concentration of commercial building designed by the city's most prominent architects in styles ranging from Italianate style of the 1880s and the Beaux Arts of the early twentieth century (Murphy and Granger 1981). The above buildings have been designated as contributing to the historic district's integrity.

There has been much recent construction within the area including Interstate 94 (1964) and the Lafayette Highway (1968) which has divided Lowertown from the rest of St. Paul. In addition, the Diamond Products building itself is of recent construction (1969). Because the Diamond Products building post-dates the period of significance of the Lowertown Historic District, this existing condition itself is a visual intrusion on the setting of the district. Demolition of the current building and rebuilding of a potential modern ball park would not be out of scale with the current building or the surrounding buildings and would be a slight change in the urban surroundings. The project would essentially perpetuate existing conditions and would have no adverse effect on the Lowertown Historic District. Even when considered cumulatively with the existing recent construction, new construction would not compromise any of the aspects of historic integrity of the Lowertown Historic District. It is not known what changes in traffic patterns, noise or lighting may result from the construction of a modern ball park.

RECOMMENDATIONS

Direct Effects

No NRHP-eligible or –listed architectural history properties are located within the APE for direct effects. Based on the level of disturbance that has occurred in the project area, it is unlikely that any potential precontact archaeological resources would remain intact. The project area is considered to have high potential for containing historical-archaeological resources. An existing historical foundation is present within the APE for direct effects, and there is potential for additional subsurface historical-archaeological resources to be present within the project area. For these reasons, if actions are proposed that will have a potential effect on the foundation, or if excavation or building demolition will take place within the project area, Summit recommends further archaeological investigation of the APE for direct effects.

Indirect Effects

The Lowertown Historic District is located within the APE for indirect effects. From several potential viewing locations in the district, the existing Diamond Products building is already a visual intrusion on the Lowertown Historic District, and future construction would not visually diminish the Lowertown Historic District's historic integrity. It is recommended that once conceptual designs are brought forward, studies regarding traffic, noise and lighting should be conducted to determine the effect on the Lowertown Historic District.

If you have any questions or require additional information, feel free to contact me at the phone number or e-mail address provided below.

Sincerely,

Summit Envirosolutions, Inc.

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Renée L. Hutter, M.F.A.

Principal Investigator, Architectural History

Laurie S. H. Ollila, M.A., RPA Principal Investigator, Archaeology

Laurie Ollila

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