



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:  
SB-7J

MAR 27 2014

Ms. Sarah Beimers, Manager  
Government Programs and Compliance  
State Historic Preservation Office  
Minnesota Historical Society  
345 Kellogg Boulevard West  
Saint Paul, Minnesota 55102-1903

Re: Remediation of Lowertown Ballpark Site in Saint Paul, Minnesota  
SHPO No. 2013-0116

Dear Ms. Beimers:

I am writing to you in response to your November 22, 2013 letter regarding a U.S. Environmental Protection Agency, Region 5 (EPA) Brownfields grant associated with the 9 acre Lowertown Ballpark site located generally Southwest of I-94 and Lafayette Road North in Saint Paul, Minnesota. Remediating the pollution on the site (the "undertaking") will facilitate the construction of a 7,000-seat ballpark, which will be owned by the City of Saint Paul. The site and vicinity were studied to identify and evaluate potential historic and archaeological resources. The studies concluded that there were no cultural resources on the ballpark site and one cultural resource, the Lowertown Historic District, within the boundaries proposed for the Area of Potential Effects (APE). For indirect effects, the recommended APE was "limited to no more than two blocks from the . . . site" and "is roughly bounded by East 7<sup>th</sup> Street on the north and East Kellogg Boulevard on the south, Wacouta Street on the west and Lafayette Freeway on the east" (Summit Envirosolutions, "Diamond Products Site Historical Review," July 22, 2011).

The use of state bond funds to support the project triggered your office's review under Chapter 138 of the Minnesota Statutes (see enclosed **letter from the City of Saint Paul**). The NHPA Section 106 process was initiated later as a result of the EPA Brownfields grant. The purpose of this letter is to merge the Section 106 and Chapter 138 processes with the submittal of documentation for your office's 90-percent review of the project.

Your November 22 letter states that you do not concur with our finding that no historic properties will be affected by this project. Specifically, you outline three areas for which you would like more information: Area of Potential Effects, Public Participation, and Consultation. In response, that information is provided below and in related attachments.

While EPA maintains that no prehistoric or historic district, site, building, structure or object included or eligible for inclusion in the National Register of Historic Places is directly affected by the remediation of the former Diamond Products contaminated brownfields site, we concur that the construction of the new Lowertown Ballpark will have an indirect “Area of Potential Effects that includes a two-block buffer around the Site that includes the Lowertown Historic District.” We feel that the analysis of indirect effects (traffic, visual, auditory or atmospheric) to the District as outline in the EAW and summarized in the City of Saint Paul’s 60-percent review submittal to you dated January 2, 2014, is adequate to determine that there will be no adverse effect to the Lowertown Historic district. Additional information on the indirect effects of parking on the APE is included as **Attachment A**.

Based on **Attachment B** (design analysis dated March 2014), we concur that the Lowertown Ballpark design will meet the Secretary of Interior’s Standards for Treatment of Historic Properties, specifically the guidelines for new construction within or adjacent to an historic district. See 36CFR800.5(b).

The project’s Community Relations Plan and a summary of public participation regarding the ballpark development was provided to you by the City of Saint Paul in January in the 60-percent review submittal. This included the vision statements and meeting minutes from the Lowertown Ballpark Design and Construction Committee (LBDCC), which is made up of fifteen members representing the local residential and business community. Established in July 2012, the “committee’s focus is to ensure that the ballpark enhances the historic and artistic character of the neighborhood and to maintain a livable and economically viable neighborhood throughout the construction process and after the ballpark is operational” (source: <http://lowertownballpark.com/about/lowertown-ballpark-design-and-construction-committee/>). Minutes from the LBDCC’s most recent meetings (February 4<sup>th</sup> and 18<sup>th</sup> and March 18<sup>th</sup>), which included discussions of historical issues, are in **Attachment C**.

EPA believes that public involvement in this process has been extensive, inclusive, lengthy and appropriate. The LBDCC meetings and numerous other public meetings have been appropriate and inclusive. While EPA’s involvement was not triggered until October 2013, EPA has, to the extent possible, coordinated the steps, as appropriate, to the overall planning schedule with other reviews and is using information developed in State law to meet the requirements of section 106, per 40CFR800.3(b), “coordination with other reviews.”

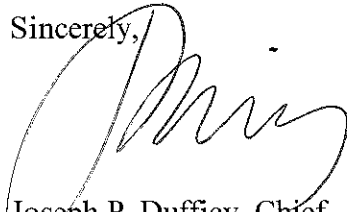
Your letter also noted that there was “no indication from EPA that there has been an effort to consult with other historic preservation organizations, local neighborhood organization or the Heritage Preservation Commission on this project.” 36CFR800.2(4) states, “The Agency official should plan consultations appropriate to the scale of the undertaking and the scope of Federal involvement . . . to use to the extent possible existing agency procedures and mechanisms to fulfill the consultation requirements of this part.” As EPA’s undertaking did not occur until October 2013 and the loan amount, \$1 million, is for the remediation of the contaminated site, not for the \$67 million construction of the ballpark, the EPA’s consultation has be appropriate to the scale and scope of the Federal involvement. The extensive and inclusive public involvement with local neighborhood organizations that occurred 18 months prior to the Agency’s involvement and has continued to occur with historic preservation organizations since EPA’s

involvement is documented in the January submittal and Attachment C. Additionally, subsequent to your November letter, the team has appeared before the Saint Paul Heritage Preservation Commission three times, on December 5, 2013, January 16, 2014, and January 30, 2014. The January 16<sup>th</sup> meeting was a well-attended public hearing. Based on this public input and thoughtful discussions by the Commissioners, the HPC passed a resolution at the January 30<sup>th</sup> meeting (**Attachment D**).

As the outcome of the Section 106 process, EPA finds that there is no adverse effect to a historic property. Please see the attached documentation, per 36CFR800.11(e) finding of no adverse effect, as provided by the City of Saint Paul in their enclosed letter.

We look forward to continuing working with your office, DEED, the City of Saint Paul and other interested parties. Please contact Keary Cragan, of my staff, at (312) 353-5669 with any questions or comments.

Sincerely,



Joseph P. Dufficy, Chief  
Community and Land Revitalization Branch

Enclosures:

Letter from Jody Martinez, City of Saint Paul, dated March 25, 2014, including:  
Attachment A: Review of Indirect Effects of Parking  
Attachment B: Design Analysis  
Attachment C: Public Participation  
Attachment D: Saint Paul Heritage Preservation Commission Resolution  
Half-size Plan Set (95-percent SHPO Review/50-percent Construction Documents)

cc: Emily Johnson, Minnesota Department of Employment and Economic Development  
Jody Martinez, city of St. Paul, Parks & Recreation Department  
Logan Gerken, Ryan A&E  
Charlene Roise, Hess, Roise and Company  
Amy Spong, Saint Paul Heritage Preservation Commission

DEPARTMENT OF PARKS AND RECREATION  
DESIGN AND CONSTRUCTION



CITY OF SAINT PAUL  
Mayor Christopher B. Coleman

400 City Hall Annex  
25 West 4<sup>th</sup> Street  
Saint Paul, Minnesota 55102  
[www.stpaul.gov/parks](http://www.stpaul.gov/parks)

Telephone: 651-266-6400  
Facsimile: 651-292-7405

March 25, 2014

Joseph P. Dufficy, Chief  
Community and Land Revitalization Branch  
US EPA, Region 5  
77 West Jackson Boulevard (SB-7J)  
Chicago, Illinois 60604

RE: Lowertown Ballpark - Merger of Chapter 138 and Section 106 Review  
Saint Paul, Ramsey County  
SHPO Number: 2013-0116

Dear Mr. Dufficy:

We have appreciated the opportunity to collaborate with Keary Cragun of your office on the cultural resources analysis related to the Lowertown Ballpark development. The use of state bond funds to support the project triggered a review by the Minnesota State Historic Preservation Office (SHPO) under Chapter 138 of the Minnesota Statutes. The NHPA Section 106 process was initiated later as a result of the EPA Brownfields grant. The purpose of this letter is to merge the Section 106 and Chapter 138 processes with your submittal to the SHPO of documentation for the 90-percent review of the project.

To assist with the evaluation of the effects of the project by your office and the SHPO, we provide a half-size plan set (90-percent SHPO Review/50-percent Construction Documents) and the following information:

- Attachment A: Review of Indirect Effects of Parking
- Attachment B: Design Analysis
- Attachment C: Public Participation
- Attachment D: Saint Paul Heritage Preservation Commission Resolution

We believe that the development of the ballpark will benefit the Lowertown Historic District and will not cause any adverse effects either during construction or once the ballpark is operational. Please let me know if you have any questions about the enclosures or need additional information.

Mr. Dufficy  
March 25, 2014  
Page 2

Sincerely,

A handwritten signature in blue ink, appearing to read "Jody Martinez", with a large, stylized flourish at the end.

Jody Martinez, ASLA  
Design & Construction Manager  
Saint Paul Parks and Recreation Department

c: Logan Gerken, Ryan A&E  
Kristin Lukes, Minnesota Department of Employment and Economic Development  
Paul Johnson, Nelson, Tietz, and Hoye  
Charlene Roise, Hess, Roise and Company  
Amy Spong, Saint Paul Heritage Preservation Commission

## **Attachment A: Review of Indirect Effects of Parking**

Braun Intertec Corporation issued the “Lowertown Ballpark Draft Traffic Study Report” in February 2013. ~~The table of contents and executive summary are attached;~~ the full study is available on request.

The study reports: “Assuming a typical walking distance of about six blocks, approximately 680 on-street parking spaces are available in addition to 6,842 publically available off-street parking spaces.” It notes that “using typical assumptions for ballpark attendance, the highest-attendance event is expected to translate into 4,450 new vehicles into the downtown area. A maximum-attendance Saints game is expected to add 2,700 vehicles to the downtown area.” As a result, “The existing supply of on-street and off-street publically available parking exceeds the expected needs of the ballpark, even for the highest-attendance event. In addition, the current supply of parking often services office employees, who vacate their spaces at the end of the work day, making space available for evening events.” (See pages 41–42.)



## **Attachment B: Design Analysis**

The Secretary of the Interior's Standards and Guidelines provide limited guidance regarding new construction in historic districts, and there is even less direction for new construction that is adjacent to, but not in, a historic district. Furthermore, historical research has shown that while the physical character of the ballpark site, which is east of Broadway, was related to that of Lowertown to the west of Broadway, the evolution was somewhat different. As a result, the buildings and infrastructure, including rail lines, of the eastern section had a somewhat different character. The analysis of the Lowertown Ballpark design is further complicated by the nature of the project, which has characteristics of both buildings and a park.

In a letter dated February 1, 2014, to Jody Martinez, City of Saint Paul, Sarah Beimers, SHPO, observed: "Per the Standards, new construction within, or adjacent to, a historic district should be designed in such a way as to be compatible with, yet differentiated from, the historic character of the district and should also protect the integrity and significant features of the historic property." The design team has made sought to meet the Secretary of the Interior's Standards by developing a design that is compatible with the Lowertown Historic District while being differentiated from it. Design modifications based on consultation with the SHPO, the Saint Paul HPC, the LBDCC, and other community members. Specific comments from the SHPO and the HPC and the development team's design response are outlined in a table on the following pages. Much of the ballpark's arrangement was set by operational requirements and the limitations of the site. Design modifications focused on the edge facing Broadway, the zone that provides a transition from Lowertown into the ballpark. Conforming to the HPC's guidelines for streetscape/sidewalk and strengthening the street edge has brought the design into compliance with the Secretary of the Interior's Standards for Rehabilitation.

Lowertown was a hub of activity for many decades after settlement began in the nineteenth century. By the mid-twentieth century, however, the area had slipped into a period of somnolence. It was only through decades of efforts by the Lowertown Redevelopment Corporation, city agencies, private developers, and others that the area's historic vibrancy is returning. The new ballpark will further advance that trend, bringing a unique amenity to the area. Construction of the ballpark will not directly affect historic resources. While the ballpark will indirectly affect the neighborhood, these effects are of a sufficiently minor nature to result in a finding of No Adverse Effect.

#	Resp.	Comment	Response
1	HPC	Seek ways to reinforce the historic street grid both in plan and elevation.	The extension of the club level into the current 5 <sup>th</sup> street alignment visually signals the historic shift in street grid while achieving the openness and views desired by the Greater Lowertown Master Plan. The original concept of 24/7 public access at historic 4 <sup>th</sup> street had to be modified as a result of site constraints. In good faith, the Saints have committed to having the ballpark open during business hours, allowing circulation along the same general path. Refer to #6 for efforts to preserve the historic street and sidewalk grid found in the District.
	SHPO	“Additional design work is needed in order to reinforce the street wall while preserving the historic street and sidewalk grid found in the District.”	
2	HPC	Reinforce the street edge along Broadway.	Extended the ticketing plaza 4’ to the edge of the ROW. Changed ticketing plaza guardrail infill from vertical pickets to more open mesh. Removed the glazed construction at ticketing and replaced with blackened steel and punched ticket windows. Added blackened steel to the seat wall and face of the ticketing plaza support wall. The uneven setbacks are driven by functional requirements of accommodating large crowds of 7,000+ spectators adjacent to the ROW and internal to the ballpark. The elevated plaza provides accessibility of these ballpark functions, adjacent to the 8% grade of Broadway.
	SHPO	“Proposed design for uneven setbacks, lack of punched openings, and incorporation of glass storefront design” is not compatible.	
	SHPO	“Elevated plaza adjacent to Building 1 . . . a severe grade separation between the building and public rights-of-way, both above and below the sidewalk, . . . is inappropriate.”	
3	HPC	Create signage that will enhance and complement the Historic District through materials, type, lighting and placement that are characteristic of Lowertown.	Roof top signage is currently not allowed by zoning code but the code is in process to be modified to allow it only for the ballpark project. Signage will be provided in consultation with the SHPO and the HPC.
4	HPC	Use public art in ways to connect with Lowertown’s character.	Public art will be provided in consultation with the SHPO and the HPC.
5	HPC	Consider materials, detailing and/or colors of the structures along Broadway that complement those found in Lowertown.	Incorporated load bearing masonry at buildings on the ground plane and used cedar wood at exposed soffits. The structural steel columns supporting the club level were enlarged.
	SHPO	“We do appreciate the incorporation of the load-bearing masonry into the design, though we feel that a color choice other than a black masonry unit would be more appropriate.”	Revised the south façade of the Club Level stair tower to provide more masonry on either side of the glazing, strengthening the appearance of punched opening detailing. The black color of the masonry is integral to the design aesthetic.



6	HPC	Streetscaping along Broadway should be consistent with the streetscaping within Lowertown.	<p>Changed street lighting to be the Lowertown Historic District standard globe lights.</p> <p>Removed the planting bed and green wall along Broadway at the ticketing plaza. Removed the benches from the ROW along Broadway.</p> <p>Varied the tree species and spacing along Broadway to be more “volunteer” in appearance. Removed sidewalk pavers and replaced with rectilinear galvanized steel grating intermixed with portions of concrete extending to the back-of-curb. Added a seat wall around the plantings on the north side of the Broadway plaza. Replaced the surmountable curb at the Broadway plaza with the typical “Lowertown” rolled curb and added two pedestrian ramps at the north and south 5<sup>th</sup> street crosswalks. Changed the plant species in the planters along Broadway to be more native grasses to be more “volunteer” in appearance. Removed the ballpark concrete paving pattern from the ROW and replaced with a typical Lowertown scoring pattern. Replaced the bollards at the Broadway plaza with a simplified, more industrial bollard.</p>
	SHPO	Design does not “incorporate landscape features, including vegetation, of a more utilitarian and ‘volunteer’ quality.” “Placement of fences, formal planters, bollards, and trees evenly spaced along the sidewalk is not compatible.”	
7	HPC	As described in certain objectives within the Greater Lowertown Master Plan, encourage exploration of a cultural district that will enhance and complement historic Lowertown through appropriate support for signage, tourism and community engagement that preserves and promotes the District.	In good faith the Saints have offered to incorporate the story, representation and promotion of the Lowertown Historic District in their signage, in-game announcements, fan services booth, website, broadcasts, branding and promotions.

## **Attachment C: Public Participation**

Minutes from Recent Meetings of the Lowertown Ballpark Design and Construction Committee (LBDCC)

- February 4, 2014
- February 18, 2014
- March 18, 2014

**Lowertown Ballpark Design & Construction Committee**  
**Meeting Notes**  
**February 4, 2014**

Present: John Mannillo, Dominic Tallarico, Cheryl Wilgren Clyne, Bill Thurmes, Jim Ivey, Logan Gerken, Paul Johnson, Jody Martinez, Melissa Martinez-Sones, Annie Huidekoper, Mark Maghrak, Andy Remke, Roger Nielsen, Winna Bernard, Julio Fesser, Lucy Thompson, Bob Close, Julie Snow, Tim Griffin, Charlene Roise,

Welcome and Introductions.

**SHPO & HPC Update.** The 30% and 60% reviews are complete, received response from SHPO on February 3<sup>rd</sup>. Design team has been meeting regularly with HPC, and HPC approved their resolution on 1/30. Discussion about the implications of the HPC resolution – their comments are made via resolution language. Logan Gerken read the seven resolution items. Julie Snow and Bob Close walked through some of the changes and started with the reinforcing of the street edge. They are exploring ways to address the HPC and SHPO issues while maintaining the integrity of the ballpark design. The actual HPC resolution was not provided to the full committee, but a visual presentation of the resolution, excerpted from the actual document was made to the group. This was then interpreted with changes made to the current design. Mannillo stated that he attended the HPC meeting and thought the changed design was a step in the wrong direction and was not what the HPC had in mind. He suggested rather than pit one group against the other (LBDCC vs. HPC), it would be more productive to get both groups together and work out the differences. Logan Gerken responded that that effort had been attempted. Mannillo was then provided a full version of the HPC Resolution. Discussion about reintroducing seating on Broadway – this is very important to the community. It was noted that the HPC said that seating in the public realm should relate to the Lowertown Historic District (an aesthetic more ‘Victorian’ than modern). Question about SHPOs concerns and if they differed – that direction was similar, all about the street edge. Design team is feeling encouraged, next meeting with SHPO is set for February 12. Mannillo thinks that approach is unproductive and the team should just get together with both groups and figure it out together. The team noted that they’ve been meeting regularly with HPC and SHPO. Although committee members were concerned about the removal of seating at the sidewalk level, other comments about the design revisions were generally positive.

**GMP/Design Update.** Paul Johnson presented on the 2-part contract between Ryan and the City; Part 1 was programming through design development, Part 2 is construction documents plus labor and materials for the ballpark. This is a “design to a budget” approach and the project is currently slightly under budget.

**Construction update.** Next week there will be one lane of Broadway shut down but this has already been communicated with Lenny Russo and the Markethouse folks. Working on odds and ends now and things are on schedule. Currently out for bid on a few items. May 2<sup>nd</sup> will be delivery of final construction docs.

The next meeting is on February 18<sup>th</sup> and public art is the only agenda item. Futures North will be here to present options. The design team will be meeting with HPC in between so they can comment on public art, too.

Meeting adjourned.

**LBDCC**  
**February 18, 2014**  
**Meeting Notes**

Present: Jody Martinez, Andy Remke, Chris Stark, Paul Johnson, Chip Lindeke, John Miller, Christina Chang, Roger Nielsen, Tom Smith, John Mannillo, Dominic Tallarico, Lenny Russo, Julio Fesser, Lucy Thompson, Jim Ivey, Annie Huidekoper, Michael Veeck, Logan Gerken, Molly Reichert, John Kim, Adam Marcus, Daniel Dean, Melissa Martinez-Sones, Bill Thurmes

Welcome and Introductions.

Futures North attended to present two potential schemes for ballpark public art. Team members discussed the process for community engagement.

**Scheme A.** “Field Condition.” Material used is aluminum bats on a wall where shape is derived from crowd-sourced data. Dynamic animation of LEDs, baseball swing surface capture makes up the data. (See handout.) Questions and discussion from committee members.

**Scheme B.** “Meander.” Made up of sculptural objects inspired by the upper Mississippi River. The top of each structure contains an LED light that can be lit to represent different aspects of the water condition.

Questions and discussion on Meander from committee members.

Committee members discussed both schemes; many expressed a desire to have both should a budget allow for that or additional funds become available in the future. Committee agreed that the preferred scheme was Meander. Thurmes asked individual committee members to share their preference and Meander was the unanimous choice.

Meeting adjourned.

## **LBDCC**

**March 18, 2014**

### **Meeting Notes**

Present: Jack Gerten, W. Berrard, Cheryl Wilgren Clyne, Tim Griffin, Jody Martinez, Andy Remke, Chris Stark, John Miller, Tom Smith, John Mannillo, Dominic Tallarico, Lenny Russo, Lucy Thompson, Jim Ivey, Annie Huidekoper, Paul Bengtson, Bill Thurmes

Welcome and Introductions.

**Minutes.** Amendments proposed by John Mannillo and Charlene Roise to the February 4, 2018 meeting minutes were discussed and accepted (with minor grammatical corrections) by the committee. The February 18, 2018 meeting minutes were also accepted by the committee. Final minutes will be available for the committee on the CRC website as soon as possible.

**State Historic Preservation Office and St. Paul Heritage Preservation Commission Update.** Jody Martinez briefed the committee on continuing meetings occurring between the city, the design team, SHPO, HPC and the EPA. The only design revisions that were being included in the 90% complete design documents were punched openings for the ticket windows, redesigned guard railing, and a slight modification to the south façade of the stair tower to reflect the previously mentioned punched windows for the ticket office. The 90% design will be submitted to agencies on or around March 25 and will likely go before HPC in June. The committee requested further information on the design revisions and the city will forward those to CRC for distribution to the committee likely in the form of the submittal supplied to the HPC in June.

**Public Art Update.** The unanimous (Public Art Selection Committee, LBDCC, public voting) public art choice was the piece 'Meander' (sculptural objects inspired by the Mississippi River). Six recommendations were made to the artists by the Public Art Selection Committee:

- 1) Prioritize making the art immediately usable and understandable by not relying too heavily on didactics.
- 2) Consider ways to use the setting's landscape and environment to support and even possibly expand the art piece.
- 3) Test river course layouts of various lengths and scales including the State of Minnesota, just Saint Paul or the whole river on the entire project site.
- 4) Take some creative license in the data to enhance the form of the piece.
- 5) Explore ways to enhance and add to the interactivity of the piece.
- 6) Consider using mock-ups as you finalize the concept.

The committee inquired about the other scheme 'Field Condition'. Jody Martinez noted that it was not funded at this time but could be refined and installed in the future if funding was identified.

**Construction Update.** Jody Martinez informed the group of a lane closure and loss of parking on Broadway between 5<sup>th</sup> and 6<sup>th</sup> that will commence March 24<sup>th</sup>. Delivery and handicapped access to Markethouse was discussed and considered vital by the committee to maintain livability for the complex. Jody Martinez agreed to follow up with the Markethouse residents on the issue. Utility work was ongoing at the site, bids for some subcontractors were coming due March 24<sup>th</sup>, and vertical work would begin roughly April 7<sup>th</sup>.

**Future Meetings.** Chair Thurmes expressed his opinion that since the majority of the design of the ballpark was complete, that the committee should discuss the future schedule of meetings and the scope of those meetings. Construction updates would continue, but the format of those updates could change if so desired. Jim Ivey and other committee members expressed an interest in reviewing circulation around the ballpark and access to the site on game day. The committee was informed that TKDA is currently working on some traffic studies for the surrounding area and that information would be forwarded to the committee by the city when it is available. The committee will continue to meet, but unless a design issue is added to the agenda the meetings moving forward will likely be just construction updates for the time being.

**Other Business.** Jody Martinez informed the committee that signage for the ballpark was still in the early design phase and the rooftop signage that the HPC favored would require a zoning ordinance amendment prior to being forwarded for approval. The designs will be brought to the committee by the design team at a future meeting.

Meeting adjourned.

**Attachment D: Saint Paul Heritage Preservation Commission  
Resolution**



**CITY OF SAINT PAUL**  
**HERITAGE PRESERVATION COMMISSION RESOLUTION**  
**FILE NUMBER** 14-BLLPK  
**DATE** January 30, 2014

**RESOLUTION COMMENTING ON THE PROPOSED  
BALLPARK ADJACENT TO THE LOCAL AND NATIONALLY DESIGNATED  
LOWERTOWN HISTORIC DISTRICT**

**WHEREAS**, Chapter 73 of the Saint Paul Legislative Code declares as a matter of public policy that the preservation, protection, perpetuation and use of areas, places, buildings, structures and other objects having a special historical, community or aesthetic interest or value is a public necessity and is required in the interest of the health, prosperity, safety and welfare of the people; and

**WHEREAS**, Chapter 73.04 states the Heritage Preservation Commission (HPC) shall serve as advisory body to the mayor and city council on municipal heritage preservation matters. Specifically, “the division of planning shall inform the commission of city planning and development activities which relate to or have potential impact on the historic and architectural heritage of the city;” and

**WHEREAS**, the City has previously been designated by the Minnesota Historical Society (MHS) with “Certified Local Government” (CLG) status for the purpose of identifying, evaluating and protecting historic properties within the City, as expressed in that Agreement between the City and the MHS under contract No. 85-C-1395; and

**WHEREAS**, the City’s ordinances enacted for the purpose of identifying, evaluating and protecting historic properties within the City have also been certified by the Secretary of the Department of the Interior as indicated in the certification letter of the Secretary dated September 25, 1985; and

**WHEREAS**, a city-owned ~7,000 seat ballpark is being built at a previously vacant and polluted industrial site (former Diamond Products Building) in Saint Paul’s Lowertown neighborhood which is directly adjacent to the local and National Register-listed Lowertown Historic District; and

**WHEREAS**, the project has received both state and federal funding which requires the project to comply with certain sections within the Minnesota Historic Sites Act and the National Historic Preservation Act (NHPA) through the State Historic Preservation Office (SHPO). These laws stipulate that both direct and indirect impacts to historic resources are to be considered; and

January 30, 2014

**WHEREAS**, the local HPC is identified by the SHPO as an interested party and often consults with SHPO during a review and comment period with goals to avoid, minimize or mitigate impacts to historic resources; and

**WHEREAS**, the SHPO stipulated in their letter to Braun Intertec Corporation on February 27, 2013 that “the design of the ballpark and supporting site development will need to meet the Secretary of Interior Guidelines for new construction within or adjacent to an historic district” and further “this does not mean creating a (false) historic design, but it does mean seeking a design language that is compatible with the adjacent historic buildings, including concern for materials, scale, massing and design articulation;” and

**WHEREAS**, the HPC reviewed the submitted ballpark drawings (100% design development), discussed the matter at their January 16, 2014 Business Meeting, allowed for public comment and made the following findings and recommendations for consideration regarding the ballpark design and its compatibility with the Lowertown Historic District:

1. The SHPO reviewed the schematic plans for the ballpark and their comments highlighted a few areas of concern which included the overall massing and scale, selection and color of certain materials and the type/style of openings in the structures. The second submittal of Design Development-level drawings was submitted to SHPO at the same time they were submitted to the HPC and their comments have not yet been provided.
2. The HPC is providing comment to assist with the SHPO’s review and comment process and also to advise on this city activity that will impact the Lowertown Historic District.
3. The HPC was presented with the significant characteristics of the Lowertown Historic District, the applicable strategies within the Comprehensive Plan and those adopted as addenda to the Plan, the applicable Secretary of the Interior’s Standards and guidelines for historic districts, a general history of the area where the ballpark is proposed, and the Period of Significance for the Lowertown Historic District which is 1867 to 1929. After taking all the information into account the seven recommendations are:
  - a. Seek ways to reinforce the historic street grid both in plan and elevation. The National Register nomination states that Lowertown is not only architecturally significant, but significant in the history of landscape architecture and city planning due to its grade changes and street grid which narrows as you move from the downtown core into Lowertown. The grid, along with the placement of the buildings at the sidewalk, contribute to the pedestrian feel and scale as well as the neighborhood’s vitality. East of Broadway, there has always been a shift in the street grid. The only place this is apparent is at Prince Street and the new ballpark should explore ways where the historic street grid could be recalled in the design,

January 30, 2014

- b. Reinforce the street edge along Broadway. Strategy 2.3.3 of the *Downtown Central Station Area Plan* (Plan) states the existing block and building pattern should be strengthened and is one of the defining characteristics of downtown. Specifically “As opportunities for infill development merges and larger redevelopment sites come forward, new development should reinforce and re-establish the existing pattern through extensions of the street grid and placement of new buildings that define the streets.” The Plan also calls for the design of the Diamond Products site to be a complementary neighbor and that the northern half of the site designated for the ballpark should include an active street-level frontage as an important interface with Broadway Street and the surrounding community (3.2.8),
- c. Create signage that will enhance and complement the Historic District through materials, type, lighting and placement that are characteristic of Lowertown.
- d. Use public art in ways to connect with Lowertown’s character. The HPC has used the following principles among other design principles when considering art installation within the Historic District, without specifying subject matter: 1) develop an understanding of the historical context in which Lowertown was envisioned, planned and built, 2) balance preserving/reinforcing the prominent features of the site/district while introducing a dynamic and vital public art component, 3) use appropriate location and attachment methods, preserving important views of historic resources and features, 4) consider how art could embody local themes that depict the shared past of the site, historic district, City or region, 5) encourage art ideas that foster educational opportunities about the cultural resources, in this case the Lowertown Historic District,
- e. Consider materials, detailing and/or colors of the structures along Broadway that complement those found in Lowertown. The Standards state that new work should be compatible with the historic character of the district or neighborhood in terms of size, scale, design, material, color, and texture. The aspects of color, material and detailing are some ways to emphasize compatibility when other aspects, such as size, scale and general design are substantially differentiated as in the ballpark’s design intent,
- f. Streetscaping along Broadway should be consistent with the streetscaping within Lowertown. This includes simple concrete sidewalks, historic globe lights of 3’s and 5’s, standard curbs and dark metal tree grates, with irregularly spaced trees. A brick gutter in the street was implemented in the 1980’s to recall the mostly brick and stone streets that were historically present, but that isn’t necessary for this project,

HPC Resolution #14-BLLPK

January 30, 2014

- g. As described in certain objectives within the Greater Lowertown Master Plan, encourage exploration of a cultural district that will enhance and complement historic Lowertown through appropriate support for signage, tourism and community engagement that preserves and promotes the District; and

**NOW, THEREFORE, BE IT RESOLVED**, the Heritage Preservation Commission encourages serious consideration of the recommendations herein as the design of the ballpark continues to evolve and would welcome further discussion and clarification on any of the recommendations; and

**FINALLY, BE IT RESOLVED**, that copies of the resolution will be sent to the Mayor and City Council, Department of Parks and Recreation, the SHPO, Saint Paul Saints, the Lowertown Ballpark Design and Construction Committee (LBDCC) and the design team.

<b>MOVED BY</b>	<b>Trout-Oertel</b>
<b>SECONDED BY</b>	<b>Wagner</b>

<b>IN FAVOR</b>	<b>7</b>
<b>AGAINST</b>	<b>0</b>
<b>ABSTAIN</b>	