

Preliminary Section 106 Findings Memo

Date: 06/08/2021

To: George Gause, Saint Paul Heritage Preservation Supervisor

From: Renee Barnes and Maggie Jones, Historians, MnDOT Cultural Resources Unit

RE: Kellogg and Exchange Bridges Project (S.P. 164-158-025)

The professionally qualified staff (as per 36 CFR 61, Section 106) in the Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU) have reviewed the above-referenced Federal Highway Administration (FHWA) undertaking pursuant to our FHWA-delegated responsibilities for compliance with Section 306108 (formerly known as Section 106 of the National Historic Preservation Act [54 USC 300101 et seq.]) and its implementing regulations, 36 CFR 800, and as per the terms of the 2015 Section 106 Programmatic Agreement between the FHWA, the U.S. Army Corps of Engineers (Corps), MnDOT, and the Minnesota State Historic Preservation Office (SHPO).

Project Description

The project consists of removing eastbound Kellogg Boulevard Bridge 90378 and constructing Bridge 62671 over Exchange Street. Eastbound Kellogg Boulevard will consist of two 11-foot traffic lanes, 11-foot right run lane, and sidewalk. The vertical profile of eastbound Kellogg Boulevard will be raised a maximum of approximately 6-inches and the horizontal alignment will not change. Exchange Street will consist of two 11-foot traffic lanes and a separated 12-foot wide trail. The vertical profile of Exchange Street will be raised a maximum of approximately 3-feet and the horizontal alignment will shift slightly to the north.

In addition, Loading Dock Road will become a one-way loop with the addition of a separate 17.5-foot wide exit lane located between the existing Loading Dock Road entrance and Exchange Street. Bridge 62672 will be constructed to accommodate the added lane and a loop exiting the loading dock area beneath Kellogg Boulevard. Constructing Bridges 62671 and 62672 and associated retaining walls will require excavation for footings and side slopes. Acquisition of a minor amount of right of way may be required on the south sides of EB Kellogg Boulevard and Exchange Street.

Area of Potential Effects

As defined in 36 CFR 800.16, the area of potential effects (APE) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” The APE includes areas of physical alteration and ground-disturbing activities; visual, audible, and atmospheric changes during and after construction. The APE encompasses the proposed construction limits and a 300-foot buffer around bridge construction for potential vibratory effects.

Consultation

Per 36 CFR 800 and existing agreements between FHWA and certain tribes, our unit invited the following groups to consult on the Section 106 process: Fort Peck Tribes, Lower Sioux Indian Community, Prairie Island Indian Community, Santee Sioux Nation, Shakopee Mdewakanton Sioux Community, Sisseton Wahpeton Oyate of the Lake Traverse Reservation, Turtle Mountain Band of Chippewa, Upper Sioux Community and the Saint Paul Heritage Preservation Commission.

Identification and Evaluation

CRU staff reviewed information on known historic properties (i.e., those determined eligible for or listed on the National Register), significant state sites, and burials/cemeteries, including databases maintained by SHPO, Office of the State Archaeologist (OSA) (including the unrecorded historic cemeteries database), and the Minnesota Indian Affairs Council (MIAC).

Archaeology

Site 21RA0032 is the only archaeological site within the APE. Site 21RA0032 was mitigated through data recovery and is no longer intact (Figure 1).

Architecture History

Much of the APE has previously been surveyed for architecture/history properties. Bridge 90378 is the only bridge 45 years or older in the APE. It was previously determined not eligible for inclusion in the National Register during the statewide bridge survey.

There are two historic-age properties that were constructed in or before 1977 within the APE that required survey. The RiverCentre Parking Ramp (circa 1970) and the District Energy St. Paul Building (circa 1900) are currently being evaluated for National Register of Historic Places (NRHP) eligibility.

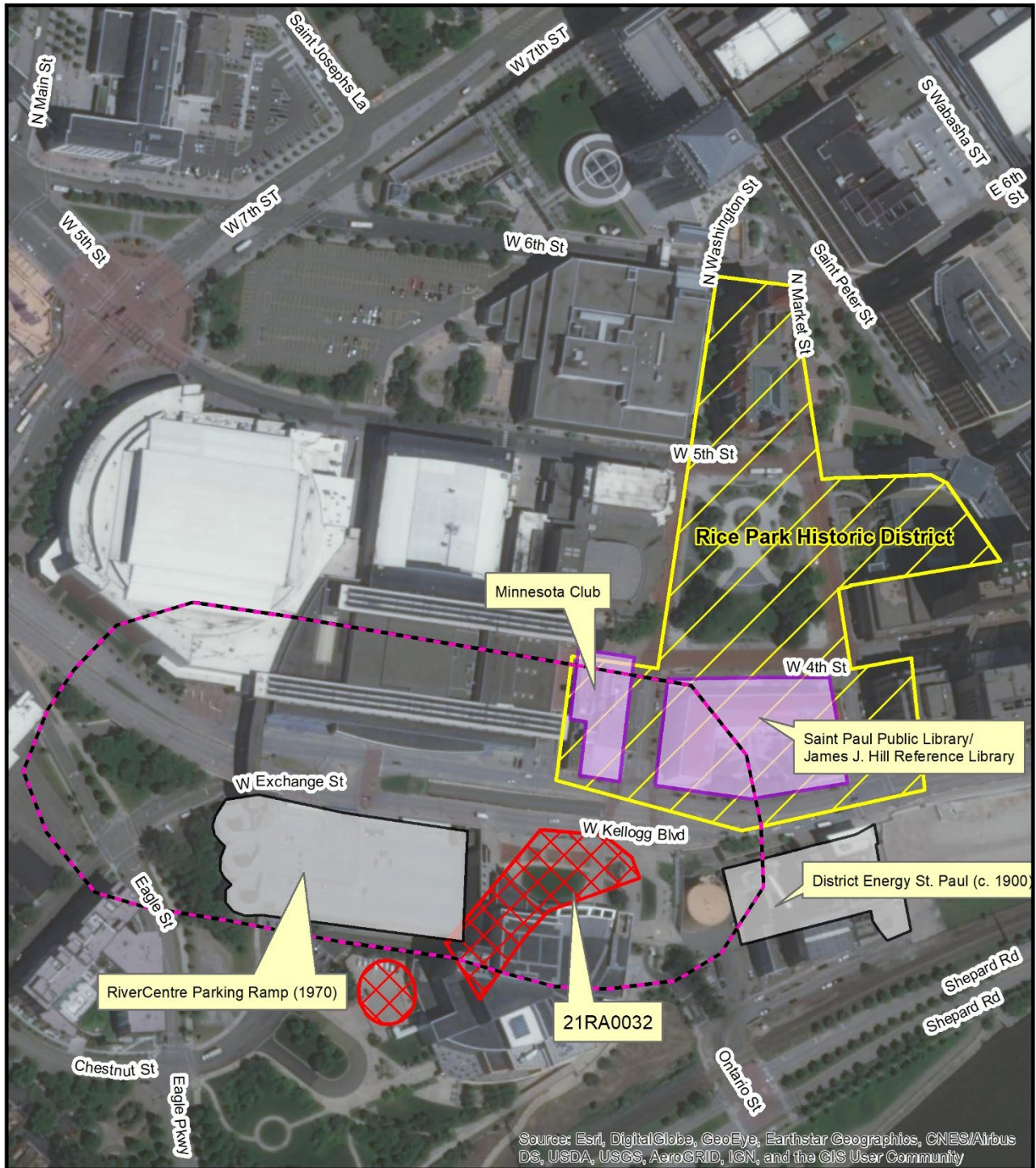
Table 1: Historic Properties in APE

Inventory Number	Historic Property Name	Eligibility
RA-SPC-4580	Rice Park Historic District	NRHP Eligible; Community Planning and Development and under Criterion C for Architecture
RA-SPC-5485	Minnesota Club	Considered individually eligible; contributing to Rice Park Historic District
RA-SPC-5266	St. Paul Public Library/ James J. Hill Reference Library	NRHP Listed; Local HPC Site; Contributing to Rice Park Historic District

Rice Park Historic District (RPHD) is eligible for inclusion in the NRHP under Criteria A and C. It is locally significant under Criterion A in the area of Community Development and Planning for the significant role it played in the history of Saint Paul through contributions in areas of social, cultural, political, and economic development. The District is also eligible under Criterion C in the area of Architecture. The period of significance begins in 1892 with the start of construction of Landmark Center and ends in 1936 with the completion of the Tri-State Telephone Company Building.

Minnesota Club is being considered individually eligible for the purposes of Section 106 for this undertaking only. It is significant under Criterion C for Architecture as an excellent example of Renaissance Revival architecture in St. Paul. The period of significance is from 1914 through 1915, during the period of construction. The Minnesota Club is also contributing to the Rice Park Historic District.

Saint Paul Public Library / James J. Hill Reference Library is listed in the NRHP under Criteria A and C. It is significant under Criterion A in the area of Education for being a center of learning, philanthropically endowed by James J. Hill, one of Saint Paul's wealthiest and most influential citizens. The property is also representative of the cultural and economic growth of Saint Paul at the turn of the 20th century. The Library is significant under Criterion C in the area of Architecture as an excellent example of Northern Italian Renaissance style architecture, a style that was popular in the U.S. from the mid-19th century to the early 20th century.¹⁰⁴ The Library's period of significance begins with its construction in 1917. The NRHP nomination does not provide an end date, but for the purpose of the Project, the period of significance will end in 1974, which corresponds with its listing date. Its character-defining features include its architectural design and prominent location on the south side of Rice Park. Additional character-defining features include the front yard marble balustrade bordering the site, the Library's marble exterior, tile roof, and Palladian entries; arched windows; ornamentation that includes denticulated band courses and cornice, garland and swag friezes, and entries with an arched molding bearing an egg and dart design and cartouches. Interior features include the Roman temple-like design of the James J. Hill Reference Library. The Saint Paul Public Library / James J. Hill Reference Library is also contributing to the Rice Park Historic District, and it is a Local Heritage Preservation Site.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Legend

- Area of Potential Effects
- Historic Properties (Listed and Eligible)
- Waiting for Survey Results
- Rice Park Historic District
- Archaeological Sites

**KELLOGG BRIDGES OVER EXCHANGE
SP164-158-025
HISTORIC PROPERTIES IN APE**

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DEPARTMENT OF
TRANSPORTATION

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Preliminary Assessment of Effects

The Project is anticipated to have **No Adverse Effect** on the **Rice Park Historic District**. The historic property would not be physically affected by the Project, nor would any Project elements visually effect the of the historic property.

The Project is anticipated to have **No Adverse Effect** on the **Minnesota Club**. The historic property would not be physically affected by the Project, nor would any Project elements visually effect the of the historic property.

The Project is anticipated to have **No Adverse Effect** on the **Saint Paul Public Library / James J. Hill Reference Library**. The historic property would not be physically affected by the Project, nor would any Project elements visually effect the of the historic property.

Two properties are being surveyed so we do not know the historic nature of the property, but if the **RiverCentre Parking Ramp** or **District Energy St. Paul** were to be eligible for the NRHP, there is little risk that these properties would be adversely effected by the Project.

Vibration

It is unknown at this time if vibration caused by demolition and construction of new infrastructure is a concern. Our unit intends to have further discussions with the city and with the designers to understand the techniques that will be employed during the Project. It is our goal through these discussions we can come up with preventive measures to ensure no damage to historic properties, therefore No Adverse Effect on the above referenced historic properties.

Preliminary Findings

The proposed work includes reconstruction of infrastructure that has existed in this location for many decades and the essential physical features of the historic properties within the APE will not be affected. The proposed work will not diminish any of the seven aspects of integrity that convey the historic significance for the properties listed above. As such, it is the preliminary finding of MnDOT CRU that the undertaking will have no adverse effect to those properties. This finding is based on the condition that our unit will review plans at 30/60/90 percent completion to ensure any project modifications do not result in any substantive changes, meaning those that would create an adverse effect on historic properties.