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**Federal Transit
Administration**

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April 6, 2020

Sarah Beimers
State Historic Preservation Office
Administration Building, #203
50 Sherburne Ave, #203
St. Paul, MN 55155-1402

RE: METRO Gold Line Bus Rapid Transit Project, Washington and Ramsey Counties, Minnesota; Phase I
Archaeology Survey of Study Areas 41 and 116, SHPO #2014-0398

Dear Ms. Beimers,

The Federal Transit Administration (FTA) is writing to continue consultation pursuant to the executed Programmatic Agreement (PA) for the METRO Gold Line Bus Rapid Transit Project (Project). Please find attached for review by the Minnesota State Historic Preservation Office (MnSHPO) a report documenting the results of a Phase I archaeology survey of two Study Areas (SA) within the Project's archaeological Area of Potential Effect (APE): SA-41 and SA-116, and a supplemental one-page document with additional information on a site found on SA-41.

The Phase I survey of SA-41 and SA-116 was completed in follow up to our July 1, 2019 submittal, which transmitted the results of a Phase I archaeological survey of areas added to the Project's archaeological APE in November 2018. We thank you for your August 2, 2019 letter, which documented MnSHPO's agreement with FTA's National Register of Historic Places (NRHP) eligibility determinations for the 123 SAs that were fully assessed by that report. As you may recall, the report identified and recommended a Phase I survey of six additional areas (SA-5, 13, 18, 27, 41 and 116) that had moderate to high potential to contain intact pre-contact or historic period archaeological sites, but were not surveyed at the time due to a lack of site access. No Project-related ground-disturbing activities are currently planned within the boundaries of these locations. As FTA noted in its letter, if, as Project design advances, it appears that any of these areas may be subject to such activities, the Metropolitan Council (MC), with assistance from the Minnesota Department of Transportation (MnDOT) Cultural Resources Unit (CRU), will conduct a Phase I survey of the SA(s) to determine if it contains any archaeological material and, if needed, complete a Phase II.

Based on a review of the 15% Design Plans that were included with the Project's Environmental Assessment (a copy was provided to MnSHPO on October 7, 2019), MnDOT CRU determined that SA-41 and SA-116 may be subject to Project-related ground-disturbing activities within their boundaries. Therefore, MC completed a Phase I survey of both SAs. The results are presented in the attached report. In accordance with the terms of the PA, MnDOT CRU reviewed the survey results and found that:

- SA-116 was negative for cultural material and, therefore, is not eligible for inclusion in the NRHP.
- A site, 21RA0084, was identified in the eastern portion of SA-41 that consists of a stone foundation and artifact deposits. The identified site is within the NRHP-listed boundaries for the Giesen-Hauser House (RA-SPC-4693), which is significant under NRHP Criteria A and C in the areas of commerce and architecture as both the “only surviving building in St. Paul associated with Peter Joseph Giesen and Eric V. Hauser” and as a notable work of architect Albert Zschocke (Sazevich 1981). The identified site is located within a portion of SA-41 that is currently outside the Project’s limits of disturbance. Therefore, the report recommends that if Project-related ground-disturbing activities will take place within the site boundary, a Phase II evaluation should be done to determine whether the features are contributing to the NRHP-listed Giesen-Hauser House or are independently eligible for inclusion in the NRHP.
- Based on the information included in the report and the additional information included on the one-page document, the foundation was constructed around the time Peter Giesen purchased the property in 1891. The foundation appears to be either a new foundation for a house that was already on the property and moved to the back of the property (to the location of the site) to make space for the construction of the Giesen-Hauser House, or it is from a new house constructed for Mr. Giesen’s son: John Giesen. The foundation and related artifacts are not distinctive, nor do they appear to have the eligibility under Criterion D. In terms of potential contributions to the NRHP listed property, the foundation is unrelated to the architectural significance of the extant house on the property under Criterion C. If the foundation was from a new house constructed circa 1891, even if the house was designed by Albert Zschocke, as a foundation remnant, the site has insufficient integrity to convey any potential architectural significance that would represent a distinctive design of Zschocke. In terms of potential contributions under Criterion A, the foundation was not the home of Peter Giesen, and as a non-visible, below ground element does not contribute to the setting of the Giesen-Hauser House within the period of significance associated with Peter Giesen. Within the property’s period of significance under Criterion A for its association with Eric Hauser, the building that stood on the foundation was used by Hauser as an outbuilding for a few years before it disappeared during the period of significance and, as such, has no strong association with Hauser’s significance under Criterion A. Therefore, Site 21RA0084 is not individually eligible for inclusion in the NRHP under Criteria A, B, C and D, and is a non-contributing resource to the NRHP listed Giesen-Hauser House under Criteria A and C.

Based on these findings, FTA has determined that SA-116 does not contain any archaeological sites that are eligible for inclusion in the NRHP and Site 21RA0084 is not individually eligible for inclusion in the NRHP and is a non-contributing resource to the NRHP listed Giesen-Hauser House.

In closing, per the terms of PA Stipulation III.A, we request concurrence with our NRHP Register eligibility determinations for the properties evaluated by this submittal within thirty (30) calendar days of this letter, which is May 6, 2020. However, we understand that a “Stay at Home” Executive Order by the governor of Minnesota to control the spread of COVID19 could impact MnSHPO’s ability to complete reviews on a timely basis. If this is the case, we ask that you email us with an estimate as to how long it may take MnSHPO to complete its review. We look forward to continuing to consult with your

office as we complete additional survey work within the Project's APEs to identify and evaluate historic properties for the NRHP that may be potentially affected by the proposed Project.

Sincerely,

Jay M. Ciavarella
Director, Office of Planning and Program Development

Enclosures: METRO Gold Line Supplemental Phase I Archaeological Survey, Ramsey and Washington Counties, Minnesota (Two Pines Resource Group, LLC, 2018)

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