MIDWEST OFFICE

NATIONAL TRUST
for HISTORIC PRESERVATION

May 5, 2005

Mr. J. Michael Orange
City Planner
City of Minneapolis
City Hall Room 210
350 S. 5th Street
Minneapolis, MN 55415

Re: Final Environmental Impact Statement (EIS) for the Pillsbury "A" Mill Complex Project

Dear Mr. Orange:

As the nation's largest non-profit organization devoted to historic preservation issues, the National Trust is concerned with protection of the historic "A" Mill Complex, as well as that of the St. Anthony Falls Historic District in which it is located. The Trust provided comments during the Environmental Assessment Worksheet process, and has continued its involvement as a stakeholder during the EIS. We appreciate the opportunity to review and comment on the Final Environmental Impact Statement for the Pillsbury "A" Mill Complex Project, and we would like to offer the following comments:

We commend your efforts to position the "A" Mill Complex within a larger revitalization plan that will respect and rehabilitate the significant historic and architectural features of the Complex while providing new residential and retail opportunities. However we have reservations about certain components of the project as presented in the Final EIS that have the potential for negative or adverse effect on the historic resources within the Complex and the surrounding Historic District.

1. Specific rehabilitation strategies and treatments for the National Historic Landmark "A" Mill building, and the seven other historic properties on the site, have not been offered for review to date. Currently there is no regulatory function that will require the *Secretary of the Interiors Standards for Rehabilitation* to be met during this lifespan project, which "is intended to be phased over the next 10 years depending on market demand and acceptance". As a result, there is no mechanism that will ensure the *Secretary of the Interiors Standards* will be applied consistently and regularly over the course of the site's multi-year redevelopment, and therefore no assurance that the adverse impacts of the proposed new construction and demolition will be in any way mitigated by the sensitive rehabilitation of the existing historic structures.

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We would recommend that a comprehensive redevelopment plan and schedule with proposed treatments for individual historic structures be submitted for review and approval as a means to guide appropriate and consistent rehabilitation of the properties over time. Access to this type of master planning document will greatly assist the Minneapolis Heritage Preservation Commission (HPC) in their understanding and review of the various phases of the development over time.

We also would recommend the City and owner further explore the option of preservation easements with the Preservation Alliance of Minnesota as a effective tool for the protection of the facades of all the historic structures on the site, or at a minimum, the "A" Mill building.

2. The EIS proposes that six new mid or high-rise residential buildings and their linking structures on Main Street will be added to the site, resulting in the creation of between 759 and 1,095 housing units and 105,000 sf of commercial space. Within the framework of the EIS, the overall design characteristics of the new construction are limited to a discussion of issues of scale, massing, siting, and height of the new construction, while critical issues of materials, detailing, window type and placement, etc. are omitted as items to be addressed in the future, and on a case-by-case basis, as outlined in the "Governmental Approval and Next Steps" of the Draft EIS.

   Again, the lack of a comprehensive plan for the redevelopment of the site makes it difficult to gauge the overall impact of the new construction on the adjacent structures and the Historic District as a whole, since exterior treatments for individual buildings will be reviewed in a piecemeal fashion as they are developed, rather than as part of a comprehensive plan intended to preserve and complement the character of the Historic District.

3. Of the four alternatives proposed for consideration, Alternatives 1-3 rely upon the same figures for housing units, commercial space, and parking units to achieve the developer's desired end product, resulting in new construction "of a size, scale and extent that could be incompatible with other resources of the riverfront and historic district". According to the conclusions of the *Analysis of Effects for the Proposed Pillsbury "A" Mill Complex Project* completed by the Section 106 group, the proposed "A" Mill Complex Project, as well as the Phoenix and 520 and 521 2nd Street SE projects, will have "adverse cumulative effects...based on the loss of contributing properties and introduction of incompatible and intrusive new construction".

   We feel this assessment is true for Alternatives 1-3, which attempt to maximize density and economic returns through the use of new construction that exceeds the height cap set by the Guidelines of the Minneapolis Heritage Preservation Commission. But Alternative 4 proposes new construction with a reduced number of residential units in structures that are both compliant with current zoning regulations and lower than the height of the Red Tile Elevators. Although still problematic due to the demolition of the Concrete Grain Elevators and the potentially inappropriate rehabilitation of the "A" Mill building, Alternative 4 at least has the potential to be brought into alignment with the *Secretary of the Interiors Standards*, whereas Alternatives 1-3 do not. The Midwest Office would be pleased to offer its services as a consulting party to discuss ways in which this Alternative might be modified to meet the *Standards*.

4. In our last comment letter we requested a schedule for the construction of the proposed development, including a comprehensive phasing plan describing treatments for all historic structures in the Complex that will remain vacant during redevelopment. This schedule was

5. not provided as part of the information within the Final EIS, nor was there any indication of the manner in which the vacant properties would be protected from fire or vandalism until they are rehabilitated. Although the Draft EIS calls for a security plan to be developed by the owner and submitted for review and comment of the Minneapolis HPC, this is specified as a *voluntary* action. There currently are no *requirements* for the protection of the vacant historic structures as part of the proposed redevelopment, including the "A" Mill building.

6. None of the alternatives considered the retention and preservation of the Concrete Grain Elevators either as a cultural artifact or renovated for a new use. These options were considered to be economically unfeasible, or to result in such a high degree of modification that "it [was] not clear that this approach would be significantly better than demolition". While we are sympathetic to the physical and economic challenges posed by on-going maintenance of vacant grain elevators and the effective adaptation of these structures, we feel it is premature to dismiss the possibility of their retention. The elevators are a contributing structure within the Historical District and an integral part of the "A" Mill Complex because they are an important component in the history and development of the site.

   We strongly encourage the City and the owner to explore options that would allow the Concrete Grain Elevators to be retained in the redevelopment of the site, either in their current state as an artifact that assists with the understanding, viewing, and interpretation of the East Bank Milling Area, or in a reuse that may result in some modification, such as parking.

Thank you for considering our comments, and please do not hesitate to contact Christina Morris in the Midwest Office at 312.939.5547 x231 if you have any questions or comments.

Sincerely,

Royce A. Yeater, AIA
Midwest Director

Cc: Richard Moe, National Trust for Historic Preservation
Christina Morris, National Trust for Historic Preservation
Amy Lucas, Minneapolis HPC
Aaron Rubenstein, Minnesota Chapter of Society of Architectural Historians
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