

**CITY OF MINNEAPOLIS
HERITAGE PRESERVATION COMMISSION STAFF REPORT**

FILE NAME: 4901 Minnehaha Avenue Minnehaha Park (BZH 25653)

CATEGORY/DISTRICT: Minnehaha Historic District

CLASSIFICATION: Certificate of Appropriateness

APPLICANT: Mike Wyatt, Minnehaha Creek Watershed District Program Coordinator

DATE OF APPLICATION: November 11, 2008

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APPEAL PERIOD EXPIRATION : December 26, 2008

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A. SITE DESCRIPTION

Minnehaha Park is locally designated (Minnehaha Historic District) and listed on the National Register of Historic Places. The park boundary coincides with the Minnehaha Historic District boundaries. The park's historic sites illustrate commercial, transportation, pioneering, and architectural themes and is itself an expression of inspired foresight into urban planning (Appendix D). Minnehaha Park's contributing features are both natural and manmade. The natural elements include the Falls and Glen. The four contributing manmade structures include the following: Godfrey Mill (1853/1854) the Minnehaha Station (1870s), the John H. Stevens House (built in 1849 moved to the park in 1896) and the Longfellow House (1906).

Serving as the central region that distinguishes the district, Minnehaha Park shows inspired foresight in urban planning. Noted American landscape architect Horace W.S. Cleveland sketched the master plan in 1883, as part of the Grand Rounds system of parks and parkways. The plan emphasized the natural beauty of the riverbanks and lakes, and proposed a linked series of open spaces, woods, vistas and recreation areas along the waterways. Cleveland's plan included the Minnehaha Falls area although it was beyond city limits at that time.

B. APPLICATION BACKGROUND

In 2004, the Minnehaha Creek Watershed District (MCWD) identified issues of erosion to the streambanks near the WPA walls, and erosion of streambanks due to the presence of footpaths. In the fall of 2005 a major storm rainfall resulted in streambank failure just below the falls and near the Minnesota Veterans Home property line. In 2007 and 2008 the MCWD and the Minneapolis Park and Recreation Board (MPRB) created a plan to address structural failures, erosion problems, and stormwater management issues.

C. PROPOSED WORK AND ANALYSIS OVERVIEW:

The proposed work is the work plan created by the MCWD and MPRB in 2007 and 2008. This plan has three main parts (see Appendix A3 for scope of work location):

1. Restoration work to the Works Progress Administration (WPA) Walls
2. Minnehaha Creek streambank improvements (along Minnesota Veterans Home Property Line)

3. Minnehaha Falls Park and Glen Streambank erosion and bluff erosion mitigation. This section has three subparts.
 - a. Riparian Wading Pool Area
 - b. Pathways
 - c. New Retaining Wall

The proposed work is discussed in individual sections below with each section providing a background of the particular elements, description of the proposed work, and an analysis of the work. When analyzing the proposed work, staff used the Secretary of Interior Guidelines for Rehabilitation for Masonry and Setting only since historic district guidelines do not exist for the Minnehaha Historic District.

1. W.P.A. Retaining Walls

Background

The historic Works Progress Administration (WPA) retaining walls, built in the 1930s in a Rustic architectural style, begin approximately 200 feet above the falls and continue for an additional 1,200 feet downstream (to the last pedestrian arch bridge). They provide bank stabilization for the creek. The wall construction consists of angular Platville limestone set in a mortar bed with a wall thickness estimated between two to three feet.

It is estimated that 95 percent of the WPA retaining walls are in tact; however, they have substantial structural deficiencies. The entire length of the wall footings has been undermined to varying degrees and the walls in some locations have substantial deterioration (Appendix C). In 2006, two segments of the walls (approximately 100 linear feet total) collapsed into the creek. Additional failures would likely take place if structural repair work to the footings is not completed.

Proposed Work

There are two types of work proposed to be completed to the WPA Retaining Walls

- Wall reconstruction for those that are collapsed or facing imminent failure (approximately 100 feet)
- Structural reinforcement for the walls in good condition (approximately 1,500 feet)

For the approximately 100 feet of walls that have collapsed, the applicant has proposed new walls in the original location that are proposed to be built to stabilize the banks. The work is proposed to first construct wall footings. The walls themselves would be built with reinforced concrete backing and a Platteville limestone veneer (see Appendix B10 and E1-E11). The existing Platteville limestone salvaged from the collapsed walls would be reused as a facing on the wall in order to maintain the historic integrity. New stone that is needed is proposed to be a combination of Chilton Country Squire, Fond do Lac, and Kasota limestone (see Appendix B15). The applicant states that the MPRB has used a blend of these limestones for similar projects above the Falls, monuments, and retaining wall repair. This new rock is proposed to be stained to maintain the appearance of the other portions of the weathered wall. For the grout, the applicant has stated that they will use a color to match the existing mortar.

There is approximately 1,500 linear feet of existing WPA walls that are standing but have scour damage at or beneath the footing or have compromised vertical structural support. For these segments of the walls the proposed work is to reconstruct steel and cement footings underneath the walls in their existing locations in order to provide needed support to maintain the structural integrity of the walls.

The applicant had the Army Corp of Engineers complete an environmental assessment for the W.P.A. retaining wall work. SHPO provided comments and conditions of approval on how the plans would not have an adverse effect (See Appendix C57). SHPO's review particularly focused on ensuring that the mortar match in terms of color, texture, composition, hardness, and joint profile. The Army Corp replied to this letter to state that they will submit plans to SHPO that address their concerns, and SHPO provided the following response to that letter "We appreciate your efforts in ensuring that this project will have no adverse effect on the Minnehaha Historic District (see Appendix C69)."

Analysis

The applicant's proposal meets the Secretary of Interior Standards for Masonry Rehabilitation by taking steps to retain and preserve the walls, salvaging the original Platteville limestone, using the overall form of the original construction to guide the new work, and by using a substitute material that will match as closely as possible the original material (Platteville limestone). The applicant's proposal with conditions of approval will also meet SHPO requirements.

2. Minnehaha Creek Streambank Improvements (Primarily along Minnesota Veterans Home Property Line)

Background

The Minnehaha Creek extends from Lake Minnetonka to the Mississippi River. In 2001-2002, two gabion-enclosed stormwater facility structures and a rock gabion stabilization structure were constructed along the creek's streambank that borders the Minnesota Veterans Home Property (see Appendix A3 and E18-E28). The applicant states that in preliminary evaluations of performance of each of these features it was determined that each was failing. The applicant further adds that, "Flow paths in the stormwater facilities eroded and undercut pathways underneath the gabions and flow directly into the creek without detention as originally designed." In addition, the streambank stabilization collapsed into the creek as the result of a 2005 rain event (Appendix B6). The remains of the Godfrey Mill Dam are located near this area approximately 275 feet to the north and west of the Minnesota Veterans Home Bridge (see Appendix A3).

Proposed Work

The applicant is proposing to do streambank repair improvements primarily in two areas of the creek. The first being the area along the Minnesota Veterans Home Property. The applicant is proposing to remove the gabion along the bank and construct other stormwater and streambank design elements along the creek bank and within the creek in order to improve stormwater and erosion conditions. The proposed work includes constructing a bio-swale, rip-rap overflow, rain gardens, rock vanes, and a vegetated reinforced bank. The proposed rock vanes and vegetated reinforced bank to the west and north of the Godfrey Dam are intended to be built to reduce the erosion that is currently taking place of this historic structure. The other area of work is located approximately 250 linear feet above the falls. The proposal is to conduct creek bank repair for approximately 150 linear feet (see Appendix E35 and E40 for details).

Analysis

The applicant's proposal is in compliance with the Secretary of Interior Standards for Setting. The replacement of the gabion system, which was constructed in 2001-2002, with other stormwater and erosion preventative systems is working towards retaining, and preserving the creek within the Glen. In addition, the proposal will not negatively alter the natural features along the pathway or the creek. The

proposed work above the Falls also complies with the Secretary of Interior Standards for Setting with the efforts to preserve the creek and falls.

3a. Riparian Wading Pool Area

Background

The riparian wading pool forms a north bank of the Minnehaha Creek within the Glen area (see Appendix A3. This is an extremely high use area in the Park, particularly in the summer. The applicant states that, “The constant foot traffic along the banks has exacerbated the process of erosion (see Appendix B8 and B9).”

Proposed Work

Due to this erosion of the riparian wading pool bank walls, the applicant is proposing to construct a limestone retaining wall around the edges to reduce the erosion rate (see Appendix E2, E12, and E13). The wall would be constructed with an initial row of partially buried limestone blocks to reestablish shoreline curve. These stones would be built to grade, approximately three feet in height. The limestone color is proposed to be weathered gray in order to match the W.P.A. walls. In addition to the initial row of limestone blocks, the applicant is proposing to add limestone pavers in five areas around the wading pool. The limestone paver areas would range in size from 50 square feet to 200 square feet.

Analysis

The applicant’s proposal is in compliance with the Secretary of Interior Standards for Setting. The proposal of adding a limestone retaining walls assists in preserving the creek and the riparian wading pool bank walls by reducing erosion. Similar to the W.P.A. retaining walls, the retaining walls for the riparian wading pool will serve as a man-made bank for the creek, and the proposed color will compliment the W.P.A. walls. The addition of the limestone retaining walls and pavers also meets the intent of the guidelines by protecting the water feature with the least amount of visual impact. It is likely that if improvements were made to the bank with natural fill the banks would continue to erode. The addition of limestone blocks will allow for continued use of this area in a sensitive manner. The retaining wall and pavers will have minimal visual impact during high-water times. Even though the limestone blocks will be visible during low-water times, the construction will not detract from the area. The choice of limestone for building material has the opportunity of being compatible with limestone in other parts of the park.

3b. Pathways

Within the Glen, South Plateau, and Preserve there are trails on both sides of the creek that extend to the Mississippi River. Most trails throughout the park are composed of small aggregate. However, in the area of proposed work there is one elevated boardwalk. This boardwalk is located on the south side of the Glen. It was installed after 1985 to try and help protect the rare ecological areas of the Glen (see Appendix E34 and E35). The boardwalk is approximately four foot wide and constructed of plastic timbers. The boardwalk decking is now in poor condition and has sunk into the ground.

Proposed Work

The proposed trail work can be broken down into four parts:

- Adding aggregate to walking trails
- Stabilizing stair systems
- Installing new elevated boardwalk within the Glen along the existing creek trail
- Constructing a new pathway within the Glen bluff with an elevated boardwalk

The first part of the project is adding aggregate to the existing walking trails. The applicant states that this is proposed in order to slow the erosion process, improve walkability, improve drainage in wet areas of trails, and better define the trails. The applicant is not proposing to widen the walking trails with the addition of the new aggregate. The second part of the project is a stabilization of one stair case just south of the second pedestrian bridge (see Appendix E35 and E43).

There are three proposed boardwalks as part of the project. The applicant is proposing to replace the four foot wide boardwalk with plastic timbers in the rare ecological area of the Glen with a new four foot wide boardwalk with metal decking that would extend approximately 750 feet (see Appendix E34, E36, E37, and E44). The decking would be approximately four inches off the ground.

The applicant is also proposing to construct elevated boardwalks within the Glen between the second and third pedestrian bridges; the linear distance is approximately 425 feet (see Appendix A3, E35, and E40). These boardwalks are proposed to be constructed with “fiber-forced plastic timber.” The boardwalk that is proposed along the creek trail would follow the existing trail. It is proposed to be six feet in width without railings and be set at grade (see Appendix E40). A vegetated buffer would be planted between the boardwalk and the Creek. The applicant has proposed the boardwalk and vegetated buffer near the creek to help reduce erosion from the heavily used walking path.

The applicant is also proposing to construct a new path within the bluff between the two pedestrian bridges. This path would be approximately 35 feet higher than the pathway near the creek. It is proposed to be four feet in width and contain three-foot railings (see Appendix E40). Climbing blocks from the path below would provide access to the upper pathway.

Analysis

The addition of aggregate and stair replacement are in compliance with the Secretary of Interior Guidelines for Rehabilitation for Settings. These repairs are general maintenance work.

The replacement of the existing boardwalk in the Glen’s rare ecological area is also in compliance with the Secretary of Interior Standards for Rehabilitation for Settings. The applicant in their plans and on a staff site visit explained the uniqueness and fragility of this natural area. The metal decking boardwalk is proposed to help protect the fragile ecological system of the Glen by elevating foot traffic. The metal decking boardwalk will also not radically change the setting of this part of the Glen.

However, the construction of new elevated boardwalk nearest the creek is not in compliance with the Secretary of Interior Guidelines for Setting. The original plan of Horace Cleveland for Minnehaha Park in 1883 was to emphasize the natural beauty of the riverbanks and the vistas along the waterways. The boardwalk proposed near the creek may help reduce erosion; however, the visual impact of having an elevated walking path would not assist in preserving one of the most important landscape features of Minneapolis and would negatively change the setting of this historic site. In addition, the applicant has not provided enough evidence that both the vegetated buffer and elevated boardwalk are necessary to assist with erosion issues.

The construction of a new pathway with an elevated boardwalk within the bluff would also not be in compliance with the Secretary of Interior Guidelines for Setting. As with the boardwalk near the creek, this proposed boardwalk would detract from the natural beauty of the riverbanks and the vistas along the walkways. Even though it is apparent that erosion is an issue within this popular area and alterations have taken place to these bluffs including the construction of the 1960’s crib walls that exist today, the addition of the bluff walking path would detract from the area by altering the views and feel of the area.

Furthermore, the addition of the boardwalk within the bluff will substantially alter the area's topography and will be clearly visible during times that tree foliage does not provide coverage.

3c. New Retaining Wall

Background

On the southside of the creek (between the second and third pedestrian bridges) there is a crib wall and retaining wall built into the bluffs (see Appendix E35, and F). The lower retaining wall is approximately 20 feet from the Creek. It is approximately three feet in height. The retaining wall near the top of the bluff is approximately five feet in height. This retaining wall has failed in at least one location. During a site visit the Applicant stated that the bluff area between the retaining walls is a popular area for park patrons to climb and therefore increases erosion. The applicant also states that rainfall has added to the erosion situation (see Appendix B23) It is apparent from this site visit that the topsoil has eroded and tree roots have been exposed.

Proposed Work

The applicant is proposing to remove the 75-foot section of the three-foot retaining wall nearest the second pedestrian bridge and replace it with an eight-foot high retaining wall (see Appendix E35 and E40). This retaining wall would be constructed with limestone blocks that are approximately two feet x two feet x three feet.

Analysis

The applicant's proposal is not in compliance with the Secretary of Interior Standards for Setting. Even though the applicant is proposing the work to assist with erosion control and there have been bluff alterations at or near this location over the years including the existing crib and retaining walls, the applicant has not provided enough evidence that the proposed retaining wall and earth fill is necessary. In addition, a drain pipe that is located in the staircase above the crib wall appears to be a big part of the reason for the erosion and failing of the crib wall (see Appendix F1, F2 (Photo 1) and F3(Photo 9B)). Staff believes that design alternatives exist that do not include the construction of the retaining wall and additional earth. The location of the proposed retaining walls is close to and within the view shed of one of the most defining landscape features of Minneapolis. The introduction of a retaining wall that is eight feet in height for approximately 75 feet would substantially alter the defining historic character of this area.

D. GUIDELINE CITATIONS:

1. The Secretary of the Interior's Standards for Rehabilitation (1990)

Masonry: *Brick, stone, terra cotta, concrete, adobe, stucco, and mortar*

Recommended:

Identifying, retaining, and preserving masonry features that are important in defining the overall historic character of the building such as walls, brackets, railings, cornices, window architraves, door pediments, steps, and columns; and joint and unit size, tooling and bonding patterns, coatings, and color.

Protecting and maintaining masonry by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved decorative features.

Cleaning masonry only when necessary to halt deterioration or remove heavy soiling.

Carrying out masonry surface cleaning tests after it has been determined that such cleaning is necessary. Tests should be observed over a sufficient period of time so that both the immediate effects and the long range effects are known to enable selection of the gentlest method possible.

Cleaning masonry surfaces with the gentlest method possible, such as low pressure water and detergents, using natural bristle brushes.

Inspecting painted masonry surfaces to determine whether repainting is necessary.

Removing damaged or deteriorated paint only to the next sound layer using the gentlest method possible (e.g., hand scraping) prior to repainting.

Applying compatible paint coating systems following proper surface preparation.

Repainting with colors that are historically appropriate to the building and district.

Evaluating the overall condition of the masonry to determine whether more than protection and maintenance are required, that is, if repairs to the masonry features will be necessary.

Repairing masonry walls and other masonry features by repointing the mortar joints where there is evidence of deterioration such as disintegrating mortar, cracks in mortar joints, loose bricks, damp walls, or damaged plasterwork.

Removing deteriorated mortar by carefully hand-raking the joints to avoid damaging the masonry.

Duplicating old mortar in strength, composition, color, and texture.

Duplicating old mortar joints in width and in joint profile.

Repairing stucco by removing the damaged material and patching with new stucco that duplicates the old in strength, composition, color, and texture.

Using mud plaster as a surface coating over unfired, unstabilized adobe because the mud plaster will bond to the adobe.

Repairing masonry features by patching, piecing-in, or consolidating the masonry using recognized preservation methods. Repair may also include the limited replacement in kind - or with compatible substitute material - of those extensively deteriorated or missing parts of masonry features when there are surviving prototypes such as terra-cotta brackets or stone balusters.

Applying new or non-historic surface treatments such as water-repellent coatings to masonry only after repointing and only if masonry repairs have failed to arrest water penetration problems.

Replacing in kind an entire masonry feature that is too deteriorated to repair - if the overall form and detailing are still evident - using the physical evidence to guide the new work. Examples can include large sections of a wall, a cornice, balustrade, column, or stairway. If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

Design for Missing Historic Features

Designing and installing a new masonry feature such as steps or a door pediment when the historic feature is completely missing. It may be an accurate restoration using historical, pictorial, and physical documentation; or be a new design that is compatible with the size, scale, material, and color of the historic building.

Not Recommended:

Removing or radically changing masonry features which are important in defining the overall historic character of the building so that, as a result, the character is diminished.

Replacing or rebuilding a major portion of exterior masonry walls that could be repaired so that, as a result, the building is no longer historic and is essentially new construction.

Applying paint or other coatings such as stucco to masonry that has been historically unpainted or uncoated to create a new appearance.

Removing paint from historically painted masonry.

Radically changing the type of paint or coating or its color.

Failing to evaluate and treat the various causes of mortar joint deterioration such as leaking roofs or gutters, differential settlement of the building, capillary action, or extreme weather exposure.

Cleaning masonry surfaces when they are not heavily soiled to create a new appearance, thus needlessly introducing chemicals or moisture into historic materials.

Cleaning masonry surfaces without testing or without sufficient time for the testing results to be of value.

Sandblasting brick or stone surfaces using dry or wet grit or other abrasives. These methods of cleaning permanently erode the surface of the material and accelerate deterioration.

Using a cleaning method that involves water or liquid chemical solutions when there is any possibility of freezing temperatures.

Cleaning with chemical products that will damage masonry, such as using acid on limestone or marble, or leaving chemicals on masonry surfaces.

Applying high pressure water cleaning methods that will damage historic masonry and the mortar joints.

Removing paint that is firmly adhering to, and thus protecting, masonry surfaces.

Using methods of removing paint which are destructive to masonry, such as sandblasting, application of caustic solutions, or high pressure waterblasting.

Failing to follow manufacturers' product and application instructions when repainting masonry.

Using new paint colors that are inappropriate to the historic building and district.

Failing to undertake adequate measures to assure the preservation of masonry features.

Removing non-deteriorated mortar from sound joints, then repointing the entire building to achieve a uniform appearance.

Using electric saws and hammers rather than hand tools to remove deteriorated mortar from joints prior to repointing.

Repointing with mortar of high portland cement content (unless it is the content of the historic mortar). This can often create a bond that is stronger than the historic material and can cause damage as a result of the differing coefficient of expansion and the differing porosity of the material and the mortar.

Repointing with a synthetic caulking compound.

Using a “scrub” coating technique to repoint instead of traditional repointing methods.

Changing the width or joint profile when repointing.

Removing sound stucco; or repairing with new stucco that is stronger than the historic material or does not convey the same visual appearance.

Applying cement stucco to unfired, unstabilized adobe. Because the cement stucco will not bond properly, moisture can become entrapped between materials, resulting in accelerated deterioration of the adobe.

Replacing an entire masonry feature such as a cornice or balustrade when repair of the masonry and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the masonry feature or that is physically or chemically incompatible.

Applying waterproof, water-repellent, or non-historic coatings such as stucco to masonry as a substitute for repointing and masonry repairs. Coatings are frequently unnecessary, expensive, and may change the appearance of historic masonry as well as accelerate its deterioration.

Removing a masonry feature that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

Design for Missing Historic Features

Creating a false historical appearance because the replaced masonry feature is based on insufficient historical, pictorial, and physical documentation.

Introducing a new masonry feature that is incompatible in size, scale, material, and color.

2. The Secretary of the Interior’s Standards for Rehabilitation

Setting

The setting is the area or environment in which a historic property is found. It may be an urban or suburban neighborhood or a natural landscape in which a building has been constructed.

The elements of setting, such as the relationship of buildings to each other, setbacks, fence patterns, views, driveways and walkways, and street trees together create the character of a district or neighborhood. In some instances, many individual building sites may form a neighborhood or setting.

In rural environments, agricultural or natural landscapes may form the setting for an individual property.

Setting: Identify, retain, and preserve

Recommended.

Identifying, retaining, and preserving building and landscape features which are important in defining the historic character of the setting.

Such features can include roads and streets, furnishing such as lights or benches, vegetation, gardens and yards, adjacent open space such as fields, parks, commons or woodlands, and important views or visual relationships.

Retaining the historic relationship between buildings and landscape features of the setting. For example, preserving the relationship between a town common and its adjacent historic houses, municipal buildings, historic roads, and landscape features.

Not Recommended

Removing or radically changing those features of the setting which are important in defining the historic character.

Destroying the relationship between the buildings and landscape features within the setting by widening existing streets, changing landscape materials or constructing inappropriately located new street or parking.

Removing or relocating historic buildings or landscape features, thus destroying their historic relationship within the setting.

Setting: Protect and Maintain

recommended

Protecting and maintaining historic masonry, wood, architectural metals, stone, and plant features through appropriate treatments such as cleaning, rust removal, limited paint removal, and reapplication of protective coating systems; and pruning and vegetation management.

Protecting building and landscape features such as lighting or trees, against arson and vandalism before rehabilitation works begins by erecting protective fencing and installing alarm systems that are keyed into local preservation agencies.

Evaluating the overall condition of the building and landscape features to determine whether more than protection and maintenance are required, that is, if repairs to features will be necessary.

not recommended.....

Failing to provide adequate protection of materials on a cyclical basis which results in the deterioration of building and landscape features.

Permitting the building and setting to remain unprotected so that interior or exterior features are damaged.

Stripping or removing features from buildings or the setting such as wood siding, iron fencing, terra cotta balusters, or plant material.

Failing to undertake adequate measures to assure the protection of building and landscape features.

Setting: Repair

recommended.....

Repairing features of the building and landscape by reinforcing the historic materials.

Repair will also generally include the replacement in kind--or with a compatible substitute material--of those extensively deteriorated or missing parts of features when there are surviving prototypes, such as porch balustrades or paving materials.

not recommended.....

Replacing an entire feature of the building or landscape when repair of materials and limited replacement of deteriorated or missing parts are appropriate.

Using a substitute material for the replacement part that does not convey the visual appearance of the surviving parts of the building or landscape, or that is physically, chemically, or ecologically incompatible.

Setting: Replace

recommended.....

Replacing in kind an entire feature of the building or landscape that is too deteriorated to repair-- when the overall form and detailing are still evident --using the physical evidence as a model to guide the new work.

If using the same kind of material is not technically or economically feasible, then a compatible substitute material may be considered.

not recommended

Removing a feature of the building or landscape that is unrepairable and not replacing it; or replacing it with a new feature that does not convey the same visual appearance.

Design for Missing Historic Features

The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

recommended

Designing and constructing a new feature of the building or landscape when the historic feature is completely missing, such as row house steps, a porch, a streetlight, or a terrace. It may be a restoration

based on documentary or physical evidence; or be a new design that is compatible with the historic character of the setting.

not recommended.....

Creating a false historical appearance because the replaced feature is based on insufficient documentary or physical evidence.

Introducing a new building or landscape feature that is out of scale or otherwise inappropriate to the setting's historic character, e.g., replacing picket fencing with chain link fencing.

Alterations/Additions for the New Use

The following work is highlighted to indicate that it represents the particularly complex technical or design aspects of rehabilitation projects and should only be considered after the preservation concerns listed above have been addressed.

Recommended

Designing required new parking so that it is as unobtrusive as possible, thus minimizing the effect on the historic character of the setting. "Shared" parking should also be planned as that several businesses can utilize one parking area as opposed to introducing random, multiple lots.

Designing and constructing new additions to historic buildings when required by the new use. New work should be compatible with the historic character of the setting in terms of size, scale design, material, color, and texture.

Removing nonsignificant buildings, additions or landscape features which detract from the historic character of the setting.

Not Recommended

Placing parking facilities directly adjacent to historic buildings which cause damage to historic landscape features, including removal of plant material, relocation of paths and walkways, or blocking of alleys.

Introducing new construction into historic districts that is visually incompatible or that destroys historic relationships within the setting.

Removing a historic building, building feature or landscape feature that is important in defining the historic character of the setting.

I. FINDINGS

1. Minnehaha Park is locally designated (Minnehaha Historic District) and listed on the National Register of Historic Places.
2. Contributing elements within the park include the natural elements of the Falls and Glen. The contributing manmade structures include the Godfrey Mill Dam (1853/1854) the Minnehaha Station (1870s), the John H. Stevens House (built in 1849 moved to the park in 1896) and the Longfellow House (1906).

3. The Minnehaha Falls and Glen Restoration Project is intended to improve structural failures, erosion problems, and stormwater management issues, and there are three parts to the project:
 - a. Restoration work to the Works Progress Administration (WPA) Walls
 - b. Minnehaha Creek Streambank Improvements along the Minnesota Veterans Home Property Line.
 - c. Minnehaha Falls Park and Glen Streambank erosion and bluff erosion mitigation and construction of a retaining wall for the riparian wading pool, pathway work, new boardwalks, and a new retaining wall.
4. The applicant had the Army Corp of Engineers complete an environmental assessment for the W.P.A. retaining wall work. SHPO provided comments and conditions of approval to in order for the plans to not have an adverse effect (See Appendix C57).
5. The proposed restoration of the WPA Walls is in compliance with the Secretary of Interior Standards for Rehabilitation for masonry.
6. The applicant's proposal for streambank improvements along the Minnesota Veterans Home is in compliance with the Secretary of Interior Standards for Setting.
7. The applicant's proposal for the riparian wading pool is in compliance with the Secretary of Interior Standards for Setting.
8. The applicant's proposal for the construction and repair work to the pathways is in compliance with the Secretary of Interior Standards with two exceptions:
 - a. The proposed plastic timber material for the new walkway above the southern bluff is not keeping in character with the natural setting.
 - b. The proposed construction of a six-foot plastic timber walkway nearest the creek between the two lower creek bridges is not in character with the natural setting and would detract from Minnehaha Falls.
9. The applicant's proposal for a new eight-foot retaining wall between the second and third creek bridges is not in compliance with the Secretary of Interior Standards for Setting.

J. STAFF RECOMMENDATION:

Staff recommends that the HPC adopt staff findings and **approve** a Certificate of Appropriateness for the Minnehaha Falls and Glen Restoration project with the following conditions:

1. CPED-Planning review and approve final site plan, floor plans, and elevations.
2. The applicant repairs the W.P.A. retaining walls per the Secretary of Interior Standards and the following SHPO comments:
 - All new mortar used in the project should match the historic mortar in terms of color, texture, composition, hardness, and joint profile. Samples of the historic mortar should be tested as a basis for the specification of the new mortar. The results of the testing and the new specifications should be submitted to our office for review and concurrence.
 - If any [archaeological] sites are identified, we [SHPO] should be consulted with regard to evaluation and treatments. Please ensure that there are adequate provisions in the construction contract to accommodate adequate time for this construction, should it be necessary.
3. The construction of the new pathway with elevated boardwalk built into the bluff is not approved.
4. The construction of a six-foot plastic timber walkway nearest the creek between the second and third pedestrian bridges is not approved.
5. The construction of a new eight-foot high retaining wall between the second and third pedestrian bridges is not approved.

K. APPENDIX:

Appendix A: Minnehaha Park Maps and Aerials

Appendix B: Application

Appendix C: ACOW Environmental Assessment and SHPO Comments for W.P.A. Retaining Walls

Appendix D: National Register Nomination Form

Appendix E: Application Plan Sets

Appendix F: Staff Images