

**CITY OF MINNEAPOLIS
CPED PLANNING DIVISION
HERITAGE PRESERVATION COMMISSION STAFF REPORT**

FILE NAME: DeLaSalle Athletic Facility, 25 West Island Avenue and 201 East Island Avenue
DATE OF APPLICATION: 7/3/06
APPLICANT: DeLaSalle High School c/o Michael O'Keefe, One DeLaSalle Drive, Minneapolis, MN
55401-1597, 612-676-7679
DATE OF HEARING: 8/8/06
HPC SITE/DISTRICT: St. Anthony Falls Historic District; Nicollet Island Sub-District
CATEGORY: The historic alignment of Grove Street is a contributing property according to National Register of Historic Places, Criteria A and C
CLASSIFICATION: Certificate of Appropriateness for New Construction
STAFF INVESTIGATION AND REPORT: J. Michael Orange (voice: 612-673-2347; facsimile: 673-2728; TDD: 673-2157; e-mail: michael.orange@ci.minneapolis.mn.us)
DATE: August 2, 2006

A. SITE DESCRIPTION

Project description: DeLaSalle High School proposes to add a regulation size football field to the DeLaSalle High School campus on Nicollet Island, for shared use by DeLaSalle High School and the Minneapolis Park and Recreation Board (MPRB). The proposed field will also provide one regulation size soccer field and three junior soccer fields, all superimposed on the football field, bleacher seating for up to 750 spectators, a press box that sits on top of and in the center of the bleachers and a concessions area within the base of the bleachers, four light towers, and loudspeakers.

The applicant is applying for a Certificate of Appropriateness to construct the DeLaSalle High School Athletic Field Project (Project). This involves the vacation of the eastern half of Grove St. and the closure of this portion of Grove Street will constitute an adverse visual effect on the District according to the National Park Service, the Minnesota Historic Society, and others. This historic street existed during the period of significance for the District and has continued in its historic use, in its historic alignment for nearly 140 years.

The Project also includes 1) resurfacing the existing impervious gravel parking lot between East Island Avenue and the Mississippi River (the East Island Avenue Parking Lot) with pervious grass pavers, and 2) improvements to the existing private "Brother's Park," which is north of the existing DeLaSalle High School Building, to provide athletic practice facilities and improve public access to and through the new athletic field.

Under Tab 4 in DeLaSalle's application can be found the Project drawings (Attachment 7 includes a list of the information in the application binder and offers ways to access all of the information via the City's web site and contact person.) Attachment 1 summarizes how the facilities will be used by the MPRB and DeLaSalle with a focus on when loudspeakers and lights will be used. Under Tab 2 in the DeLaSalle application can be found the Reciprocal Use Agreement between the MPRB and DeLaSalle. The athletic facility is proposed to be built on the following three contiguous parcels of land:

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- MPRB property bounded by the Nicollet Street bridge, the Burlington Northern Railroad right-of-way, East Island Avenue, and Grove Street;
- The portion of the Grove Street right-of-way between Nicollet Street and East Island Avenue; and
- The portion of the DeLaSalle property that DeLaSalle High School currently uses for its practice field.

B. SITE CONTEXT

DeLaSalle Campus: The existing DeLaSalle High School campus has been on Nicollet Island since 1900. In 1959, DeLaSalle acquired the portion of the campus on which it proposes to construct the Project. In 1984, DeLaSalle graded the site for use as field for its athletic and recreational programs, including a practice field for football, and continues to use it for that purpose.

The MPRB land is the former site of industrial uses, most recently Twin City Tile and Marble. The MCDA and MPRB conducted environmental investigation and, to the extent required, remediation of the land they acquired in 1983, including the MPRB land that is part of the Project site. About one half of the site is currently occupied by a set of three asphalt tennis courts, surrounded by chain link fencing. The remaining one half of the site is open space, recently planted with 1-inch caliper ash and maple trees.

Grove Street: Grove Street was platted as a public street in 1866 and has been used for that purpose since. Grove Street runs east and west across Nicollet Island and connects East Island Avenue and West Island Avenue. In 1996, the City of Minneapolis repaved Grove Street with brick pavers. Grove Street provides access to two multi-family residential properties, the administrative offices of DeLaSalle High School, and the Nicollet Street Bridge. The Nicollet Street Bridge crosses over the railroad tracks and provides a connection between the north and south parts of the Island when East Island Avenue and West Island Avenue are blocked by a train. East Island Avenue and West Island Avenue each cross those railroad tracks at grade level. The land immediately north of the Project site is railroad right-of-way. There are about two-acres of MPRB open space north of the railroad right-of-way, and single-family residences on MPRB land beyond the open space.

Context within the district: Off the Island and across the Mississippi River on the downtown side is the parkland of the West River Parkway/Great River Road and the Federal Reserve Bank complex. The Post Office is downriver from the Federal Reserve and Hennepin Avenue. North of the railroad crossing are row house and townhouse residential developments. Off the Island to the east bank are the new, 6-to-8 floor apartment developments upriver from 1st Avenue, Riverplace downriver, and townhouses and Boom Island Park upriver from the railroad crossing.

Surrounding land uses: The land uses surrounding the Project site on the Island reflect the implementation of the 1983 Nicollet Island Agreement and related transactions among the Minneapolis Community Development Agency (MCDA), MPRB and the Metropolitan Council. Under the 1983 Agreement, all the land on Nicollet Island except the DeLaSalle property, three

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multi-family residential structures, and the existing rights-of-way, was acquired to create a regional park under the jurisdiction of the MPRB. Certain parcels acquired for the Park were reserved for private use of these public lands. They include the residential properties north of the railroad tracks, which were reserved for private residential use, and the Nicollet Island Inn and the Nicollet Island Pavilion, which were reserved for private commercial use.

The parcels that are not owned by the MPRB are all between Hennepin Avenue and the railroad right-of-way at the center of Nicollet Island. (Photos of surrounding properties can be found on Sheet B6 under Tab 4 and in Attachment 2 of this report.) They consist of the DeLaSalle High School property and three multi-family residential properties on land that is bounded by the Nicollet Street Bridge, Grove Street, West Island Avenue, and the railroad right-of-way. The privately owned parcels are as follows:

- DeLaSalle High School, 25 West Island Avenue, also known as One DeLaSalle Drive
- Grove Street Flats, 2 through 18 Grove Street, a residential condominium located in the historic Eastman townhouse
- 20 Grove Street, an affordable housing cooperative located in a building constructed in 1960 and originally used as a truck storage garage by the Hertz Corporation.
- 31 through 53 West Island Avenue, a modern, wood-framed, multi-family condominium building

In addition, the following parcels are owned by the MPRB but are occupied exclusively for private uses pursuant to leases with the MPRB:

- Nicollet Island Inn, 95 Merriam St
- The Pavilion, 16 Power Street
- All the residential properties north of the railroad tracks

Athletic fields and high schools in Minneapolis are located near residential uses and are allowed as conditional uses in the residential zoning districts. The Project will introduce a new activity to the Island with seating for 750 spectators, lights, and loudspeakers, all of which do not currently exist. This new activity has the potential for conflict with residential uses. The City's Conditional Use Permit process, which this Project will be reviewed under, provides the City and the neighbors the opportunity to encourage and enforce siting and design changes that could minimize those effects. According to the draft Travel Demand Management (TDM) Plan (look under Tab 3 and the section, EAW Documents Incorporated by Reference in the DeLaSalle application binder), the proposed parking capacity for the Project will be sufficient for the new facility and the Project will not cause significant traffic effects. The site is separated from the single-family residences to the north by the railroad tracks and open space. The Nicollet Street bridge abutment provides some separation from the site from the housing cooperative and the condominiums to the west.

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C. CONSIDERATION OF EFFECTS ON THE HISTORIC DISTRICT

- 1. The Environmental Assessment Worksheet and available documentation:** The City of Minneapolis prepared a Mandatory Environmental Assessment Worksheet (EAW) for the DeLaSalle Athletic Field Project (Project) under Rule 4410.4300 subpart 31 Historical Places. The Project is located on Nicollet Island, the entirety of which is located in the St. Anthony Falls Historic District (District). The Project calls for the complete removal and destruction of a one-block stretch of Grove Street, nearly half of the entire length of the street. This historic street existed during the period of significance for the District and has continued in its historic use, in its historic alignment for nearly 140 years.

On 10/21/05, the City published the EAW and on 11/15/05, the City held a public comment meeting on the document. The City provided responses to the 220 pages of comments received on the EAW in its "Findings of Fact and Record of Decision" (EAW Findings) Document. Based on the EAW, the "Findings" document, and related documentation in the public record for the Project, the City of Minneapolis concluded on 12/23/05 that the EAW was adequate and that no Environmental Impact Statement was required. All documents associated with the EAW are available on the City's web site: (<http://www.ci.minneapolis.mn.us/planning/delasalle.asp#TopOfPage>) and by request of the Planning Division. The EAW and the EAW Findings Document are also included under Tab 4 in the DeLaSalle application binder (however, the comment letters are not included).

DeLaSalle High School does not believe there are any environmental hazards on the Project site.

- 2. Archeological resources analysis in the EAW:** State rules for preparing an EAW require the applicant to provide the City the data needed for the EAW. As such, DeLaSalle hired Michelle Terrell of Two Pines Resource Group, LLC to prepare the required response to EAW Question 25 that addressed archaeological resources. Two Pines Resource Group completed a literature search to determine whether the Project area contains, or has the potential to contain, any archaeological resources that may be potentially eligible for listing on the National Register of Historic Places (NRHP). (A copy of the full report by Two Pines Resource Group is available on the City's web site (<http://www.ci.minneapolis.mn.us/planning/delasalle.asp#TopOfPage>) and by request of the Planning Division. It can be found under Tab 3 and the section, "EAW Documents Incorporated by Reference," in the DeLaSalle application binder.) This assessment included background research at the State Historic Preservation Office and the Minnesota Historical Society, review of soil boring logs, and a visual reconnaissance of the Project area. Included herein is a summary of the complete technical report which includes project methodology and the results and recommendations of the archaeological literature search.

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No archaeological sites have been previously identified within the Project area, but Two Pines Resource Group concluded that there is a high potential for the area to contain intact pre-contact (pre-Anglo-European) and historical archaeological resources that may be eligible for listing on the National Register of Historic Places. These potential historically significant archaeological resources include Native American occupation sites, as well as features associated with the homes of Nicollet Island residents. Three of the potential historical archaeological sites (Bassett/Nimocks, Calladine, and DeLaittre homes), and the area of highest pre-contact archaeological potential (Lot 2 of Auditor's Subdivision No. 92), are located on Minneapolis Park and Recreation Board parcels, while the remaining two historical archaeological sites (W. W. Eastman and Rea/Seacombe homes) are located on the property of DeLaSalle High School. These potential archaeological resources will be affected by proposed grading and demolition activities on the property. Two Pines Resource Group did not recommend an Area of Proposed Effect (APE) for archeological resources as part of the EAW.

DeLaSalle High School has committed to consult with the Minneapolis Heritage Preservation Commission and the Minnesota Historical Society to define the appropriate program to provide an archaeological investigation of the site, and will have that program in place before any land disturbance is initiated.

In its comments on the EAW, the National Park Service argued against allowing the Project to proceed at the proposed site and stated the following as regards archeological resources: "If the project is approved where proposed and the proposers elect to proceed, we strongly recommend that . . . an archeological survey and evaluation be completed before a final decision on the stadium project is made." In its comments on the EAW, the Minnesota Historical Society stated that, "Additional archeological work is needed before undertaking any terrain alteration of this area."

- 3. Historical resources analysis in the EAW:** Similar to the case for the archeological resource analysis, DeLaSalle hired Carole Zellie of Landscape Research LLC to prepare the required response to EAW Question 25 that addressed historical resources. (A copy of the full report by Landscape Research is available on the City's web site (<http://www.ci.minneapolis.mn.us/planning/delasalle.asp#TopOfPage>) and by request of the Planning Division. It can be found under Tab 3 and the section, "EAW Documents Incorporated by Reference," in the DeLaSalle application binder.) The purpose of the investigation was to assess the properties already determined to be contributing to the St. Anthony Falls Historic District and to develop an historic context for previously undocumented Grove Street. DeLaSalle campus buildings (1922-1959) were not evaluated. Landscape Research did not recommend an Area of Potential Effect (APE) for historic resources as part of the EAW. The following summarizes the findings and conclusions in the Landscape Research analysis as regards effects on contributing resources:

- **Grove Street alignment:** Grove Street (1865) extends between East and West Island Avenues and is one of the original residential streets of Nicollet Island.

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Approximately one-half of its length is within the Project area, and vacation and demolition is proposed for athletic field construction. There are no remaining buildings on the street within the Project area. Grove Street Flats, at the west end, is the only building remaining from the period of historic significance that fronts on the street (however, the original DeLaSalle Building, a contributing structure located on West Island Ave. near the intersection, is visible from Grove St.). Grove Street thus retains only its historic alignment. All historic paving and other features were removed during 1990s street improvements. The Island's original street plan (1865) is an important component of its historic spatial character, and the streets contribute to the overall feeling and character of the district. While there are no remaining historic buildings on Grove Street between Nicollet Street and East Island Avenue, this is also true of portions other nearby island streets where there are now-vacant lots. According to NRHP Bulletin 15, a district "possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development . . . a district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources" (NRHP Bulletin 15, 1995).

Street layout, alignment, width, and paving and elements such as lights and sidewalks contribute to qualities of feeling and association within an historic district. Bulletin #15 also notes that "a component of a district cannot contribute to significance if it has been substantially altered since the period of the district's significance or if it does not share the historic associations of the district." Street paving and features such as curbs and gutters, however, are typically repaired and replaced over time. Grove Street's historic alignment and relationship to the 1865 Nicollet Island plan remain its distinctive components. Closure of this portion of Grove Street will constitute an adverse effect on the historic district.

- **Grove Street Flats:** The Grove Street Flats (1877; a.k.a. Eastman Townhouses) are approximately 250 feet west of the Project. The Grove Street Flats are nationally significant under NRHP Criteria A and C in the area of architecture and Minneapolis residential development (Section D. 4. below lists the NRHP Criteria). The period of significance is 1876 to 1885, "marking the date this fashionable neighborhood was at its height" (Roberts NRHP 1991:8.3). Landscape Research stated that the proposed new construction does not appear to have an impact on the Grove Street Flats building.
- **Nicollet Island Residential Area:** The Nicollet Island Residential Area is located at the northern tip of the island more than 250 feet north of the proposed Project area and the St. Paul and Pacific Railroad. The area contains 20 contributing buildings, 9 non-contributing buildings, and 2 contributing structures and is significant under NRHP Criterion A as representative of broad patterns of history, and Criterion C for its distinctive types of a period of architecture. The NRHP nomination notes that the area is significant "as the most physically and visually

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coherent example of early riverfront residential development remaining in the City of Minneapolis” (NRHP 1991:8.1). The period of significance is 1866 to 1898 and is represented by the island’s collection of residential housing styles. Landscape Research stated that the proposed new construction does not appear to have an impact on the Nicollet Island Residential Area.

- **The St. Paul and Northern Pacific Railroad:** The St. Paul and Northern Pacific Railroad (1867) crosses the island near the northern boundary of the proposed Project area. Although not individually documented in the district nomination, the railroad alignment is among the earliest in the St. Anthony Falls Historic District and is shown on the original plat of Nicollet Island. The line is in active use and retains a high degree of feeling and association. The bridge connecting to the west bank was Minneapolis’ first railroad bridge constructed across the Mississippi. The Nicollet Street Bridge was replaced in 1996. Landscape Research stated that the proposed new construction does not appear to have an impact on the St. Paul and Pacific Railroad.

4. Analysis of the original DeLaSalle High School building at 17 West Island Ave.:

Although Landscape Research described this property in its report (refer to pp. 16-17 in the EAW), it did not include a full evaluation of the building and did not categorize it as a contributing or non-contributing building to the District. However, the Planning Division’s preservation staff concluded in its 1999 and 2002 reports¹ to the Minneapolis HPC as regards prior DeLaSalle applications for expansions to the high school that the original 1922 structure is a contributing building to the District. The 2002 report states: “De LaSalle High School started in 1900; the oldest remaining building faces West Island Avenue and was constructed in 1922. The 2 ½ story, red brick school building was designed by Damon, O’Meara and Hills of St. Paul for the Archdiocese of St. Paul. . . . The original school building falls within the period of significance for the St. Anthony Falls Historic District.”

5. Potential effects to the District in general: The following are excerpts from the comment letters on the EAW submitted by the National Park Service and the Minnesota Historical Society as regards potential historic effects on the District (the letters from the National Park Service and the Minnesota Historical Society can be found in the submission from Steven M. Christenson in Attachment 4):

- **National Park Service:** The National Park Service commented on the EAW as regards the Project’s potential effects on the Comprehensive Management Plan developed for the Mississippi National River and Recreation Area (CMP/MNRA): “The proposal is inconsistent with the historic preservation goals of the CMP. One of the principle purposes for which Congress established the MNRA was to preserve, enhance and interpret its archeological, ethnographic,

¹ Applications by DeLaSalle for additions to the historic building. First application was heard by the HPC at its 3/9/99 hearing and the second at its 6/11/02 hearing.

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and historic resources. Of all the places that convinced Congress to establish MNRA, the St. Anthony Falls Historic District is one of the most important. . . . The proposed DeLaSalle Stadium development would adversely affect the St. Anthony Falls Historic District in a number of ways. Grove Street is one of the physical anchors that define the historic setting of Nicollet Island. Its presence on the Island since the late 1860s grounds us in how historic events developed along and around it. Grove Street is one of the few through streets on the Island, running from one side of the Island to the other. As such, it is a defining feature of the Island's landscape which helps interpret aspects of the Island's history. It does not require buildings lining the eastern end to serve this purpose. As designed, the project would have additional adverse effects beyond destroying a large section of Grove Street. The design calls for bleachers to be built across the road alignment. This would present a serious visual obstruction to what was once a clear line of sight down the road destroying the visual role the road played as one of the through streets on the island. The proposed mast lighting would also adversely affect the historic district, particularly since the Island has 360 degree visibility. The structure and stadium lights would be out of character with the historic district and would be visible from all directions. . . . Given the benefits of the stadium project stated in the EAW, we believe those benefits simply do not justify the adverse effects on the St. Anthony Falls Historic District. The District is significant at the local, state, and national levels and the project would only benefit a relatively small, local group of users. . . . In accordance with the CMP, new activities that do not need a river location, that do not contribute to the riverfront environment, or that would cause some environmental degradation, or have some other detrimental effects on corridor resources, should be located outside the riverfront area. . . . If the project is approved where proposed and the proposers elect to proceed, we strongly recommend that an unlighted stadium be implemented.”

- **Minnesota Historical Society:** The Minnesota Historic Society comments on the EAW concluded as follows: “We conclude that the proposed stadium would have a significant adverse effect on the historical character of the island and on the St. Anthony Falls Historic District. Grove Street currently establishes a strong visual and functional demarcation for the northern portion of the island. Here, the original 1860s street patterns are intact, as is the overall character of a residential neighborhood bordered by riverbanks. By removing half of the length of the original 1866 Grove Street, paving over portions of the riverbank area, and introducing a new structure of a scale and configuration not in keeping with the area's historic patterns, the feeling and character of the island would be substantially diminished. In this regard, we disagree with several of the conclusions presented in the . . . EAW—namely that the project will not have an adverse effect on Grove Street Flats, the Nicollet Island Residential Area, or the St. Paul and Northern Pacific Railroad. On the contrary, we think that the feeling and setting of these areas and the island would be adversely impacted. Among the

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factors contributing to this impact are potential changes in volumes and patterns of traffic, increased lighting, and general intensification of land use.”

- 6. Comments from others:** The EAW Findings Document included the review of the 220 pages of comments received from 45 people during the public comment period and the two hours of testimony from the 20 speakers at the Public Comment Meeting. The report grouped the comments into the following seven general categories:
- The impact of the Project on the interpretation of the St. Anthony Falls Historic District and the historic character of Nicollet Island
 - The conformance of the Project with the applicable plans and polices for the area.
 - The impacts on vehicular circulation and parking, pedestrian impacts, and the Travel Demand Management Plan.
 - The impact of the Project on the residences on Nicollet Island and the East Bank.
 - The assertion that the EAW did not study all of the connected and phased aspects of the Project, including the relocation of the tennis courts.
 - The need to consider alternative sites not located on Nicollet Island, perhaps through an Environmental Impact Statement.
 - Other comments.

Attachment 4 includes the letter from Steven M. Christenson (dated 7/25/06) to the Minneapolis HPC Commissioners. Mr. Christenson, like many of the people who submitted letters during the EAW phase of this project, is adamantly opposed to the Project’s location on Nicollet Island. He also attached a copy of the EAW comment letters from the Preservation Alliance of Minnesota (dated 11/22/05), the Friends of the Mississippi River (dated 11/14/05), the Sierra Club (dated 11/23/05), Robert C. Mack (dated 8/9/05), and two letters from Robert Roscoe (dated 7/25/05 and 11/15/05). All of these attached letters are already in the public record for the EAW and are included again here in Attachment 4. All of these organizations and individuals expressed opposition to the Project’s location on Nicollet Island. Mr. Christenson also included a letter sent by the Midwest Office of the National Trust for Historic Preservation (dated 2/14/06) and addressed to the Minneapolis Park and Recreation Board. In it, Royce A. Yeater, Midwest Director, requests the Park Board “consider all other possible alternatives for the expansion of the DeLaSalle Athletic Fields before committing to the current proposed site.”

D. PROPOSED CHANGES

The applicant is applying for a Certificate of Appropriateness to construct the Project. This involves the vacation of the eastern half of Grove St. and, as stated above, the closure of this portion of Grove Street will constitute an adverse visual effect on the District according to the consultants for the EAW, the National Park Service, the Minnesota Historic Society, and others. There is disagreement among interested parties as to whether the construction aspects of the Project (e.g. bleachers, press box, paving, retaining walls, fences, lights, loudspeakers, etc.) may also have an adverse effect upon the District.

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E. GUIDELINE CITATIONS

1. Chapter 599, Heritage Preservation Regulations, Article VI: Certificate of Appropriateness

599.310. Purpose. Certificates of appropriateness are established to protect landmarks, historic districts and nominated properties under interim protection by providing the commission with authority to review and approve or deny all proposed alterations to a landmark, property in an historic district or nominated property under interim protection.

599.320. Certificate of appropriateness required. Any alteration of a landmark, property in an historic district or nominated property under interim protection shall be prohibited except where authorized by a certificate of appropriateness approved by the commission.

599.330. Application for certificate of appropriateness. An application for a certificate of appropriateness shall be filed on a form approved by the planning director and shall be accompanied by all required supporting information, as specified in section 599.160.

599.340. Hearing on application for certificate of appropriateness. The commission shall hold a public hearing on each complete application for a certificate of appropriateness as provided in section 599.170. The commission may approve, approve with conditions, or deny an application for certificate of appropriateness.

599.350. Required findings for certificate of appropriateness. (a) *In general.* Before approving a certificate of appropriateness, the commission shall make findings that the alteration will not materially impair the integrity of the landmark, historic district or nominated property under interim protection and is consistent with the applicable design guidelines adopted by the commission, or if design guidelines have not been adopted, is consistent with the recommendations contained in The Secretary of the Interior's Standards for Rehabilitation, except as otherwise provided in this section.

(b) *Destruction of any property.* Before approving a certificate of appropriateness that involves the destruction, in whole or in part, of any landmark, property in an historic district or nominated property under interim protection, the commission shall make findings that the destruction is necessary to correct an unsafe or dangerous condition on the property, or that there are no reasonable alternatives to the destruction. In determining whether reasonable alternatives exist, the commission shall consider, but not be limited to, the significance of the property, the integrity of the property and the economic value or usefulness of the existing structure, including its current use, costs of renovation and feasible alternative uses. The commission may delay a final decision for a reasonable

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period of time to allow parties interested in preserving the property a reasonable opportunity to act to protect it.

599.360. Certificate of appropriateness conditions and guarantees. (a) *In general.* Following commission approval of an application, the applicant shall receive a signed certificate of appropriateness and approved plans stamped by the planning director. The applicant shall produce such certificate of appropriateness and plans to the inspections department before a building permit or demolition permit may be issued. The signed certificate of appropriateness and stamped plans shall be available for inspection on the construction site together with any inspections department permit.

(b) *Mitigation plan.* The commission may require a mitigation plan as a condition of any approval for demolition or relocation of a landmark, property in an historic district or nominated property under interim protection. Such plan may include the documentation of the property by measured drawings, photographic recording, historical research or other means appropriate to the significance of the property. Such plan also may include the salvage and preservation of specified building materials, architectural details, ornaments, fixtures and similar items for use in restoration elsewhere.

(c) *Additional conditions and guarantees.* The commission may impose such conditions on any certificate of appropriateness and require such guarantees as it deems reasonable and necessary to protect the public interest and to ensure compliance with the standards and purposes of this chapter.

2. **Nicollet Island Historic District Guidelines:** The Nicollet Island Historic District Guidelines of the Minneapolis HPC are based on those adopted for the St. Anthony Falls Historic District. Because they only address the houses on the island, they do not offer policies applicable to this project.
3. **Excerpts from the St. Anthony Falls Historic District Guidelines (adopted by the Minneapolis HPC in June 1980; an addition to "District Guidelines for Utilization" (adopted April 18, 1978)):**

Preamble: The St. Anthony Falls Historic District is a varied area that includes structures of historical significance (e.g. mills), some that are architecturally distinguished (e.g. Our Lady of Lourdes), buildings that contribute to the historicity of the district (e.g. Salisbury Mattress Co., now Main Place), some non-contributive buildings (e.g. Post Office Parking Ramp), and also a great deal of open space. Traditional, uniform regulations are not adequate because of this variety. Instead, the HPC has divided the district into sub-areas that contain structures with common features and that share common concerns.

Purpose: The purpose of the Heritage Preservation Commission in following these regulations for permit review is to provide architectural control and maintenance of the St. Anthony Falls Historic District by promulgating regulations governing construction

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and rehabilitation for the preservation, protection and perpetuation of the St. Anthony Falls Historic District designated by the State of Minnesota.

These regulations apply to any and all new construction and rehabilitation of existing buildings and structures within the St. Anthony Falls Historic District.

The furthermore are intended to:

- 1) preserve the memory of past events
- 2) encourage sympathetic new development
- 3) encourage and enable access to the river
- 4) foster along the riverfront and adjacent areas a viable community geared to the pedestrian.

General Regulations: Infill construction shall be visually compatible with historic structures within the sub-area with regard to siting, height, proportions of facade, walls of continuity, rhythm of projections, directional emphasis, materials, nature of openings, texture, roof shapes, details, and color.

The Heritage Preservation Commission shall review all permit requests according to the standards established in the regulations. Variances to these regulations will be granted only in cases where an applicant clearly demonstrates that an alternative design is a superior and compatible solution.

F. Nicollet Island (Masonry)

This area extends from Grove Street to the south end of Nicollet Island. It also extends north of Grove Street to approximately 150' north of the railroad tracks.

1. Siting: New buildings shall be constructed with principal elevations facing the street. Buildings moved onto Grove Street shall be in line with the Grove Street Flats.
2. Height: New buildings shall be one-to-two stories high, so that significant views are preserved. Overall building height not including chimneys shall be between 20 and 40 feet.
3. Rhythm of Projections: Projections, if provided, shall be limited to the lower 1-1/2 stories and the central portion or major subdivisions of the building.
4. Directional Emphasis: The existing buildings have no strong directional emphasis. Therefore, new buildings also shall have no strong emphasis.
5. Materials: New buildings shall be constructed of brick or limestone.
6. Nature of Openings: Openings should appear in a constant and repeated pattern across the principal facades. Window openings should be approximately 2 times as high as they are wide. Windows and doors should be set toward the front of the openings.

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7. Roof Shapes: New roofs should be flat or nearly flat. Mansard roofs similar to the Grove Street Flats should be considered on a case-by-case basis.
8. Details: There are no special requirements.
9. Color: Primary surfaces of new buildings should be buff or grey. Trim should be subdued earth tones or flat black.

4. U.S. Department of the Interior, National Park Service, the National Register Criteria for Evaluation: National Register criteria define, for the Nation as a whole, the scope and nature of historic and archeological properties that are to be considered eligible for listing in the National Register of Historic Places.

Criteria for Evaluation:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- a. That are associated with events that have made a significant contribution to the broad patterns of our history: or
- b. That are associated with the lives of persons significant in our past: or
- c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. That have yielded, or may be likely to yield, information important in prehistory or history.

Criteria Considerations:

Ordinary cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. A birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life; or
- d. A cemetery that derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

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- e. A reconstructed building, when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.

5. National Park Service, Secretary of the Interior Standards for Reconstruction

In response to the adverse effect on the District caused by the vacation of a portion of the Grove Street, DeLaSalle has proposed mitigating measures that involve the principles of reconstruction. The following are the Secretary of the Interior's Standards for Reconstruction:

Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

Reconstruction as a treatment: When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, reconstruction may be considered as a treatment.

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F. ANALYSIS

1. Per Chapter 599.350 (a) of the Heritage Preservation Regulations: Will the alteration materially impair the integrity of the historic district and is it consistent with the applicable design guidelines adopted by the commission?

- **Archeological resources:** The Planning Division agrees with the analysis and conclusions of the Two Pines Resource Group, the National Park Service, and the Minnesota Historical Society as documented in the EAW as regards archeological resources: No archaeological sites have been previously identified within the Project area, but there is a high potential for the Project area to contain intact pre-contact and historical archaeological resources that may be eligible for listing on the National Register of Historic Places. The Planning Division concludes that the proposed grading and demolition activities on the Project site will have an adverse effect on any on-site archaeological resources that may be disturbed.

- **Grove Street:** The Planning Division agrees with the analysis and conclusions of Landscape Research, the National Park Service, and the Minnesota Historical Society as documented in the EAW as regards vacating a portion of Grove Street: Nicollet Island’s original street plan (1865) is an important component of its historic spatial character, and the streets contribute to the overall feeling and character of the district. The visual aspects of the street layout, alignment, width, paving, and elements such as lights and sidewalks contribute to qualities of feeling and association within an historic district. Grove Street’s historic alignment and relationship to the 1865 Nicollet Island plan remain its sole distinctive component. The Planning Division concludes that the historic Grove Street alignment is a contributing property based on NRHP Criteria A and C, and that closure of a portion of Grove Street will constitute an adverse visual effect on the District.

- **Compatibility of Project with Nicollet Island Sub-District Design Guidelines:**

Grove Street Flats: The Minneapolis HPC has adopted the following specific guidelines for the Nicollet Island (masonry) sub-district of the St. Anthony Falls Historic District in order to judge whether a project will be visually compatible with the historic structures in the sub-district:
 - **Siting: New buildings shall be constructed with principal elevations facing the street.** The only building associated with the Project is a bleacher structure which will have seating for 750 people, a press box that sits above the center of the bleachers, and space for concessions and restrooms in the ground-level interior. Consistent with the guideline, the principal elevation faces west toward the intersection of Grove St. and Nicollet St.

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- **Height:** New buildings shall be one-to-two stories high, so that significant views are preserved. Overall building height not including chimneys shall be between 20 and 40 feet. Consistent with the guideline, the height of the bleacher structure will be 29 ft.
- **Rhythm of projections:** Projections, if provided, shall be limited to the lower 1-1/2 stories and the central portion or major subdivisions of the building. The bleacher structure will not include any projections.
- **Directional emphasis:** The existing buildings have no strong directional emphasis. Therefore, new buildings also shall have no strong emphasis. The west elevation of the bleachers faces the intersection of Grove St. and Nicollet Island Ave. The east side has the rows of bleacher seats and the windows of the press box which face the field. The footprint of the building is 116 ft. by 38 ft. with the longer side approximately perpendicular to Grove Street. The height of the bleachers at 29 feet gives it an overall horizontal massing which is broken up into smaller units by the spacing of different materials. For comparison, the nearest contributing buildings, Grove Street Flats and the original DeLaSalle High School building, also have overall horizontal massing with vertical elements (e.g. doors, windows, projections, and quoins) that create a vertical directional emphasis.
- **Materials:** New buildings shall be constructed of brick or limestone.
 - **Bleacher structure:** The bleacher structure will have the following materials: Grey stone-face block (11.5" X 23.5" X 3.5") for the 4-ft. base of most of the west side and half of the north and south sides. Stucco and two tones of brick, one a buff and the other a dark brown color, will fill out the rest of the three sides of the bleacher structure including the press box. Buff stone-face caps will top the walls.
 - **Ticket booth:** The ticket booth will be a portable structure that will be positioned near the field only during ticketed events. The predominant material will be buff-colored stucco.
 - **Landscape and retaining wall materials:** Retaining walls and pedestrian paths will be constructed of rock-faced anchor blocks and dark red pavers respectively. The lightest color buff brick will be used for the stairs to be built to the existing L.L. Gray Gymnasium (refer to Sheet A3 under Tab 4 in the applicant's submittal binder).

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- **Railings:** Railings will be of decorative painted metal.
- **Color: Primary surfaces of new buildings should be buff or grey. Trim should be subdued earth tones or flat black.** Consistent with the guidelines, the primary building materials include grey stone-face block; buff-colored stucco; three tones of brick (a buff, a dark red, and a dark brown); dark red pavers; and buff-colored, stone-face cap stones. All of these bricks were picked to match exactly the bricks that can be found in the existing DeLaSalle buildings, including the contributing original high school building. The grey stone-face block is similar in color (but not texture) to the sandstone in the Grove Street Flats building. The red brick (designated as “Medium” on the plans) is similar in color to that of the adjacent non-contributing building at 20 Grove Street (built in 1960).
- **Nature of openings: Openings should appear in a constant and repeated pattern across the principal facades. Window openings should be approximately 2 times as high as they are wide. Windows and doors should be set toward the front of the openings.**
- **Mobile bleachers and main bleacher opening:** The center of the bleacher structure is open (14 ft. wide by 8 ft. high). Although this is wider than it is tall, it is valuable to have as large an opening as possible to allow a view across the field of the historic Grove St. alignment. During events when the bleachers will be in use, a portable section of bleachers will be moved into place in the opening. At other times, the movable bleachers will be placed on the soccer fields. The opening will remain open when the main bleachers are not in use. The drawings for the proposed stadium do not indicate that the openings are aligned in such a way as to allow clear views east and west through and along the Grove Street alignment.
- **Windows:** There are no windows proposed for the west façade; the primary façade that faces the public streets. There are 10 windows proposed for the three sides of the press box that face the interior of the site. These windows are 3.5 ft. wide and 4 ft. high and located 20 ft. above the ground. There is one window set horizontally (13 ft. by 3 ft.) on the north side of the structure facing the rest of the school. This window design is inconsistent with the guidelines; however, they all face the interior of the site. The glass in all of the windows is set toward the front of the openings.
- **Roof shapes: New roofs should be flat or nearly flat. Mansard roofs similar to the Grove Street Flats should be considered on a case-by-**

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case basis. The roof over the press box is flat and accessible for the purpose of filming stadium events.

- **Other possible considerations:** The following issues address other Project characteristics that were identified as potential issues in the EAW, although they are not specifically listed in the Design Guidelines for the District:
 - **Views and lighting:** As noted above, the National Park Service concluded that building the bleachers across the Grove St. alignment would present a serious visual obstruction to what was once a clear line of sight down the road in both directions and would destroy the visual role the road played as one of the through streets on the Island. The Planning Division points out that this visual obstruction would be modified somewhat for views to the east through the large opening proposed for the bleachers (refer to the section below regarding mitigating measures). However, the approximately 9-ft.-high retaining wall will completely block views to the west down the alignment from East Island Ave. Additionally, the view down a street—with its character-defining elements like curb and gutter, pavement, street lights, etc.—is substantively different than a view through an opening in a bleacher towards banners on the far side of an athletic field that mark the former alignment. (The EAW addressed the issue of views on p. 27.) The drawings for the proposed stadium do not indicate that the openings are aligned in such a way as to allow clear views east and west through and along the Grove Street alignment.

The National Park Service concluded that the proposed mast lighting would adversely affect the District, particularly since the Island has 360 degree visibility; and that the stadium lights would be out of character with the historic district and would be visible from all directions. The Minnesota Historical Society also mentioned lights as having an adverse effect. The proposed lighting levels for the field are discussed in the response to Question 26 in the EAW and in the accompanying consultant’s report on lighting that is part of the EAW (pp. 27-28 of the EAW and pp. 13-14 of the EAW Findings Document). The consultant’s conclusion is as follows: “Because of the new lighting technology proposed for the project, a uniform coverage of 50 foot-candles can be provided on the field, while reducing off-site levels to less than 0.5 foot-candles within approximately 100 feet of the field and to 0.1 foot-candles within several hundred feet of the field. Typical light levels measured around the island ranged from 0.2 to

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0.5 foot-candles. Therefore, no significant adverse impact from field lighting is anticipated.”

The Minneapolis Zoning Code at 535.590 (b)(1) sets a standard of ½ foot-candles (ftc) at adjacent residential property lines. The light intensities at the athletic field site boundary described in Figure 26 along Nicollet range from 0.40 foot-candles (ftc) at Grove and Nicollet St., to 0.10 ftc at the railroad tracks, and 0.22 ftc to 0.46 ftc along East Island Avenue. These estimates are below these standards. The Zoning Code exempts athletic fields from compliance with these standards at 535.590 (c)(2).

As shown in Attachment 1, the lights will likely be on for approximately 2 ½ hours during the 4-7 DeLaSalle varsity football events held during Friday evenings in the fall of the year, and during some of the 20-28 boys and girls varsity soccer games held on weekdays and evenings in the fall.

The Zoning Code requires the lights to be off by 10 p.m. for athletic fields. While the light masts and lights will be visible from wherever there is a view of the Project site, the Planning Division believes that off-site effects can be minimized through enforcement of existing City ordinances and that this visibility does not constitute an adverse effect on the District.

- **Traffic:** As noted above, the Minnesota Historic Society concluded that the potential changes in volumes and patterns of traffic would have an adverse effect upon the District. However, the Historical Society did not specify exactly how the potential changes in volumes and patterns of traffic would have an adverse visual effect on the District. The EAW included an extensive analysis of the traffic effects of the Project (pp. 15-19), including a full Travel Demand Management Plan (available under Tab 4 in the DeLaSalle application binder). Also, the EAW Findings Document (pp. 9-12) included additional traffic analysis in response to the above referenced comments from the Historical Society and several other commentators (including Mr. Christenson). The EAW analysis concluded that the Project will not have significant adverse effects on traffic and parking in the area. As such, the Planning Division believes that potential changes in volumes and patterns of traffic will not have an adverse effect upon the District.
- **Noise:** Several individuals expressed concerns regarding the potential for stadium noise, especially loudspeaker noise, to have

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an adverse effect on the District. Attachment 1 indicates that there will be 48-59 DeLaSalle events that will require use of the speakers during the fall of the year and about 40 MPRB events during the entire year.

The EAW addressed this matter in detail on pages 20-23 and concluded that loudspeaker noise, although audible off site, will not exceed state standards, and that “no significant adverse noise effects are anticipated from the proposed athletic facility.” The EAW pointed out that sound can be reduced with a four-pole system rather than the two-pole system proposed for the facility. It should be noted that this noise assessment did not compare the stadium’s potential noise effects to the ambient levels of noise that result from the more than 50 trains that cross the Island.²

Based on the above analysis, the Planning Division concludes that Grove Street Flats is a contributing property based on NRHP Criteria A and C, and that the Project (other than the effects of the partial closure of Grove St.) will not have a significant adverse effect on the Grove Street Flats.

- **Nicollet Island Residential Area:** The above analysis regarding the Grove Street Flats applies to the Nicollet Island Residential Area as well, and, based on this analysis, the Planning Division concludes that the Nicollet Island Residential Area is a contributing property based on NRHP Criteria A and C, and that the Project (other than the effects of the partial closure of Grove St.) will not have a significant adverse effect on the Nicollet Island Residential Area.
- **The St. Paul and Northern Pacific Railroad:** The above analysis regarding the Grove Street Flats applies to the St. Paul and Northern Pacific Railroad as well, and, based on this analysis, the Planning Division concludes that the St. Paul and Northern Pacific Railroad is a contributing property based on NRHP Criteria A and C, and that the Project (other than the effects of the partial closure of Grove St.) will not have a significant adverse effect on the St. Paul and Northern Pacific Railroad.
- **The original DeLaSalle High School building:** The above analysis regarding the Grove Street Flats applies to the original DeLaSalle High School building at 17 West Island Ave. as well, and, based on this analysis, the Planning Division reconfirms that the original DeLaSalle High School building is a contributing property based on NRHP Criteria A and C, and concludes that the Project (other than the effects of the partial closure of Grove St.) will not have a significant

² The BNSF rail line on the Island is also the proposed route for the Northstar Commuter line (estimated 9 trains a day) and the Red Rock commuter route (estimated 9 trains per day).

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adverse effect on the original DeLaSalle High School building.

- **Compatibility with the Nicollet Island Sub-District:** Based on the above analysis, the Planning Division concludes that the siting, height, massing, materials (type and color), and windows and openings of the Project are generally compatible with the Sub-District guidelines; and that the Project design (other than the effects of the partial closure of Grove St.) will not have a significant adverse effect on the Nicollet Island Sub-District.
2. **Per Chapter 599.350 (b) of the Heritage Preservation Regulations: Are there reasonable alternatives to the destruction? In determining whether reasonable alternatives exist, the commission shall consider, but not be limited to the following:**
- a. **The significance of the property:** As stated above, the Planning Division agrees with the archeological assessment contained in the EAW that there is a high potential for the Project area to contain intact pre-contact and historical archaeological resources that may be eligible for listing on the National Register of Historic Places. Also as stated above, the Planning Division agrees with the historic resources assessment contained in the EAW that concluded that the historic alignment of Grove Street is the aspect of the street that is a contributing property to the District. An important aspect of this alignment is the view it offers in both directions. The drawings for the proposed stadium do not indicate that the openings are aligned in such a way as to allow clear views east and west through and along the Grove Street alignment.
 - b. **The integrity of the property and the economic value or usefulness of the existing structure, including its current use, costs of renovation, and feasible alternative uses:**
 - **Potential archeological resources:** The value of the potential archeological resources cannot be determined at this time. The logical time to make this determination would be during the excavation and grading phase of the Project, should it be approved.
 - **Grove Street closure:** As a part of the initial review of the Project, the Minneapolis Park and Recreation Board (MPRB) established by resolution on 8/29/05 a 22-person Community Advisory Committee (CAC) process to advise the Board regarding the Project (pursuant to MPRB Ordinance PB-11).

The Project had the following “Basic Program Requirements” (refer to the information under Tab 2 in the application binder):

- Fields must be on-site, adjacent to DeLaSalle
- Fields need to be lighted

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- Seating for 750 persons is minimal
- Sound systems support events
- Safety and security are key issues
- Standards / guidelines must be addressed
- The context and scale must be appropriate
- Historical context must be acknowledged

The resolution required the CAC “to review all aspects of the project including the detailed site plan, design, location, and use of the proposed athletic facility.” Although the resolution specifically limited consideration of alternative locations “to adjacent parkland,” the CAC did examine five alternative Park Board sites not on Nicollet Island. These sites were the B. F. Nelson Fields, Van Cleve Park, Fort Snelling, Bryn Mawr, and the Parade Stadium. After consideration of the programmatic needs of the Park Board and DeLaSalle, and the potential effects on the resources, natural environment, and current businesses and residents, the CAC determined that the programmatic needs of DeLaSalle and the Park Board cannot reasonably be accommodated on land that is not adjacent to Nicollet Island.

The CAC, by its adopted resolution of 10/4/05, recommended the MPRB and DeLaSalle proceed in the consideration of the proposed Project because it best addressed the existing conditions on Nicollet Island while meeting the needs of the school and the park system. On 3/1/06, the MPRB adopted the CAC recommendations and approved the Concept Plan after public hearings. (Attachment 3 of this report includes the resolution that created the CAC and the CAC’s final action. Under Tab 2 in the DeLaSalle application binder is information regarding programmatic and design requirements, the alternative site considerations, and the executed Reciprocal Use Agreement between the MPRB and DeLaSalle High School.)

DeLaSalle also presented information regarding on-site alternatives, and the feasibility of an alternative that locates the athletic field between the high school and Hennepin Ave. (refer to Concept E on Sheet B5 under Tab 4 in the DeLaSalle application binder). In order to include the standard football field and its required 20-ft. buffer zone, this alternative required a realignment of the access road to the Hennepin Ave. Bridge and to portions of Hennepin Ave. and West Island Ave. DeLaSalle identified no resources to fund the necessary public improvements for this alternative.

- 3. Per Chapter 599.360 (b) of the Heritage Preservation Regulations, Mitigation plan: The commission may require a mitigation plan as a condition of any approval for demolition of a property in an historic district. Such plan may include the**

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documentation of the property by measured drawings, photographic recording, historical research or other means appropriate to the significance of the property. Such plan also may include the salvage and preservation of specified building materials, architectural details, ornaments, fixtures and similar items for use in restoration elsewhere.

a. Potential archeological resources: As stated above, DeLaSalle High School has committed to consult with Minneapolis CPED-Planning and the Minnesota Historical Society to define the appropriate program to provide an archaeological investigation of the site, and will have that program in place before any land disturbance is initiated. The Planning Division concludes that an Archeological Resources Assessment and Mitigation Plan (Archeological Mitigation Plan) could provide sufficient mitigation of any potential adverse archeological resources effects posed by the Project, provided the Archeological Mitigation Plan includes the following:

- It shall be prepared consistent with the Phase I, II, and III assessments as defined in the “SHPO Manual for Archeological Projects in Minnesota.”
- It shall document all intact pre-contact and historical archaeological resources discovered on the Project site during the excavation and grading phases of the Project.
- Documentation shall include measured drawings, photographic recording, historical research, or other means appropriate to the significance of the property.
- The mitigation section of the plan shall address the salvage and preservation of building materials, architectural details, ornaments, fixtures, and similar items that are discovered for use in restoration elsewhere.

b. Grove Street closure:

Mitigation measures proposed by DeLaSalle: The “Statement in Support of Application for Certificate of Appropriateness” located under Tab 1 in the DeLaSalle application binder includes the following measures proposed by DeLaSalle to mitigate the impact of closing a portion of Grove Street:

- (1) An opening in the bleacher structure will align with the center line of Grove Street, marking the location of the street and preserving some of the views down Grove Street from the west.
- (2) Paving and landscaping will indicate the east and west ends of the closed portion of Grove Street.

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- (3) New public pedestrian paths through the project site will preserve and enhance pedestrian connections between East Island Avenue and the intersection of Grove and Nicollet Streets.
- (4) Rock-faced masonry retaining walls and painted metal fences will replace existing wood retaining walls and chain-link fences with materials that are consistent with recent improvements to Nicollet Island, including the new Nicollet Street bridge, and other improvements in the St. Anthony Falls Historic District.
- (5) New improvements will displace existing tennis courts and pastoral landscaping that are inconsistent with the residential development of the 1860s through 1890s and the industrial development of the 1900s through 1980s with improvements that are consistent with the more manicured landscapes of an affluent residential district of the late 19th Century, which is the period of historic significance for the district.
- (6) Although the parking lot improvements on East Island Avenue do not directly impact Grove Street, those improvements will replace an ad hoc eyesore of a gravel parking lot with an orderly, landscaped parking area that is more consistent with the period of historic significance.
- (7) A niche in the retaining wall at the intersection of East Island Avenue and Grove Street will provide a location for a Nicollet Island historical display.

DeLaSalle also makes the following statement as regards the reversibility of the closure: “DeLaSalle does not propose to demolish irreplaceable historic resources. Nothing in the DeLaSalle project would prevent re-establishment of Grove Street in the future.”

- Since the contributing characteristic of Grove Street is limited to its historic alignment, the Planning Division believes that certain proposed measures do help to mitigate this adverse effect (i.e. items 1, 2, and 7), and the Division agrees with DeLaSalle’s point that the closure is reversible. The Project includes a partial preservation of the eastward view down the Grove St. alignment by having a large opening through the bleacher structure that lines up with the banners on the east side of the field that will mark the eastern end of the alignment. Also, paving and landscaping will indicate the east and west ends of the closed portion of Grove Street. Note that the paving on the east end will be at the East Island Ave. street grade and approximately 9 feet below the level of the field. Also, the plan includes a niche in the retaining wall at the intersection of East Island Avenue and the Grove Street alignment that will provide a location for a historical display. The drawings for the proposed stadium do not indicate that the openings are aligned in such a way as to allow clear views east and west through and along the Grove Street alignment.

Historic effects: Comments on the EAW by the National Park Service and the Minnesota Historical Society capture the essence of Grove Street and the historic

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effect of the partial closure: “Grove Street is one of the physical anchors that define the historic setting of Nicollet Island. Its presence on the Island since the late 1860s grounds us in how historic events developed along and around it. Grove Street is one of the few through streets on the Island, running from one side of the Island to the other. As such, it is a defining feature of the Island’s landscape which helps interpret aspects of the Island’s history.” “Grove Street currently establishes a strong visual and functional demarcation for the northern portion of the island. Here, the original 1860s street patterns are intact By removing half of the length of the original 1866 Grove Street, . . . the feeling and character of the island would be substantially diminished.” The proposed mitigation plan does very little to mitigate these adverse effects.

The Minneapolis HPC regulations for the St. Anthony Falls Historic District are specifically intended to encourage and enable access to the river, and to foster along the riverfront and adjacent areas a viable community geared to the pedestrian. Grove Street provides a highly legible pedestrian route towards the east and west banks of the river. In contrast, the partial vacation of Grove St. and the Project design detours pedestrian and bicycle access around the proposed stadium thereby restricting access to the riverbanks and impeding especially pedestrian access.

The Secretary of the Interior Standards for Reconstruction provide guidance for assessing the value of the proposed mitigation of the adverse effect. Standard # 4 above states that, “A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.” The proposed mitigation measures only preserve a partial view from a single direction and that view is at an oblique angle to the layout of the bleachers and athletic field. Further, they offer minimal features (an opening in the bleachers, two banners at the east end of the athletic field, at-grade decorative paving at both ends, and a niche in a retaining wall for a plaque) to reconstruct a sense of the historic alignment.

Additional potential mitigating measures from the Planning Division: The following measures can help to mitigate the adverse effects of closing a portion of Grove Street:

1. The site plan shall include a partial preservation of the eastward view down the Grove St. alignment by having an opening that is as large as possible through the bleacher structure that lines up with banners and other architectural features on the east side of the field that will mark the eastern end of the alignment.
2. This opening under the center of the bleachers shall be free of obstructions except during DeLaSalle varsity football events and youth soccer and football events sponsored by the Minneapolis Park and Recreation Board.

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During these events, the mobile bleachers may be placed in the opening. At other times, the mobile bleachers shall be placed where they will not block the view down the historic alignment.

3. Paving and landscaping will indicate the east and west ends of the vacated portion of Grove Street and the width of the paving shall match the current street width.
4. Historical plaques shall be placed at the east and west ends of the vacated portion of Grove St. The design and informational content of the plaques shall be a cooperative effort that includes the staff of the Planning Division and the Minnesota Historic Society.
5. At all times, public access for pedestrians, people with handicaps (must meet ADA requirements), and bicyclists shall be preserved on the paths that maintain the connections between Grove Street and East Island Ave. around the north and south sides of the Athletic Facility.

Planning Division conclusion: The Planning Division concludes that the measures proposed by DeLaSalle and the above-listed potential measures would not be sufficient to mitigate the adverse effects of closing a portion of Grove Street.

F. FINDINGS

The Planning Division makes the following findings:

1. **Historic designation:** The DeLaSalle High School Athletic Field Project (Project) is located within the Nicollet Island Sub-District of the St. Anthony Falls Historic District (District), which is listed on the National Register of Historic Places (NRHP) and locally designated.
2. **DeLaSalle application:** DeLaSalle High School is applying for a Certificate of Appropriateness to construct the Project. This involves the vacation of the eastern half of Grove St.
3. **Contributing properties:** Based on NRHP Criteria A and C, contributing properties in the Nicollet Island Sub-District include the following: The historic alignment of Grove Street, Grove Street Flats, the Nicollet Island Residential Area, the St. Paul and Northern Pacific Railroad, and the original DeLaSalle High School building.
4. **Effects of the Grove Street closure:** Closure of a portion of Grove Street will constitute an adverse visual effect on the District.

**CITY OF MINNEAPOLIS
CPED PLANNING DIVISION
HERITAGE PRESERVATION COMMISSION STAFF REPORT**
Certificate of Appropriateness for the DeLaSalle Athletic Facility Project located at 25 West Island Avenue and 201
Island Avenue East

5. **Compatibility of construction with District Guidelines:** The siting, height, massing, materials (type and color), and windows and openings of the construction aspects of the Project are generally compatible with the Nicollet Island Sub-District Guidelines and will not have a significant adverse effect on the District.
6. **Other potential effects on the District:** Potential off-site effects due to traffic, congestion, parking, lighting, and noise, including loudspeaker noise, will not have a significant adverse effect on the District.
7. **Potential archeological resources:** There is a high potential for the area to contain intact pre-contact (pre-Anglo-European) and historical archaeological resources that may be eligible for listing on the National Register of Historic Places.
8. **Potential mitigation for Grove Street closure:** The measures proposed by DeLaSalle are not sufficient to mitigate fully the adverse effects of closing a portion of Grove Street. Even if the potential measures listed in the Analysis section of this report were implemented, they would not in and of themselves reverse the adverse effects of closing a portion of Grove Street.
9. **Archeological Resources Assessment and Mitigation Plan:** The measures proposed by DeLaSalle are not sufficient to mitigate fully the potential adverse archeological effects posed by the Project. However, an Archeological Resources Assessment and Mitigation Plan (as described above in the Analysis section of this report) could provide sufficient mitigation of any potential adverse archeological resources effects posed by the Project.
10. **Reasonable alternatives:** The Minneapolis Park and Recreation Board (MPRB) and the Community Advisory Committee examined alternative sites on and off the island and they concluded that there are no reasonable alternative sites that allow the Project to meet the siting, design, and programmatic criteria adopted by the MPRB and DeLaSalle High School.
11. **Outcome of EAW process:** The analysis in the Environmental Assessment Worksheet (EAW) prepared by the City for the Project identified a single potential significant adverse effect; namely, the closure of the Grove Street alignment.
12. **National Park Service letter:** The National Park Service (NPS) commented on the Project's potential effects on the Comprehensive Management Plan developed for the Mississippi National River and Recreation Area (CMP/MNRA). The NPS concluded a) that the proposed mast lighting would adversely affect the District, particularly since the Island has 360 degree visibility; b) that the stadium lights would be out of character with the historic district and would be visible from all directions; and c) that the proposal is inconsistent with the historic preservation goals of the CMP.
13. **Minnesota Historical Society letter:** The Minnesota Historical Society concluded that the feeling and setting of the historic areas and the Island would be adversely impacted.

**CITY OF MINNEAPOLIS
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Certificate of Appropriateness for the DeLaSalle Athletic Facility Project located at 25 West Island Avenue and 201
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Among the factors contributing to this impact are potential changes in volumes and patterns of traffic, increased lighting, and general intensification of land use. The Minnesota Historical Society concluded as follows: “We conclude that the proposed stadium would have a significant adverse effect on the historical character of the island and on the St. Anthony Falls Historic District.”

14. **Other views:** There is disagreement among interested parties as to whether the construction aspects of the Project (e.g. bleachers, press box, paving, retaining walls, fences, lights, loudspeakers, etc.) may also have adverse effects upon the District. The extensive public record created for the EAW for the Project and the ongoing record for the City’s permit review processes documents this disagreement fully.

G. STAFF RECOMMENDATION:

The Community Planning and Economic Development Department—Planning Division recommends that the Minneapolis Heritage Preservation Commission **adopt** the above findings and **deny** the Certificate of Appropriateness for the DeLaSalle Athletic Facility located at 25 West Island Avenue and 201 East Island Avenue.

**CITY OF MINNEAPOLIS
CPED PLANNING DIVISION
HERITAGE PRESERVATION COMMISSION STAFF REPORT
Certificate of Appropriateness for the DeLaSalle Athletic Facility Project located at 25 West Island Avenue and 201
Island Avenue East**

Attachments:

1. Events at the Athletic Facility that will Draw Spectators and Require the Use of Loudspeakers and Lights
2. Photos of the area (refer also to the photos behind Tab 5 in the DeLaSalle application binder)
3. Actions of the Citizen Advisory Committee and the MPRB:
 - Resolution Related to the Athletic Field Proposed by DeLaSalle on Nicollet Island, executed 8/29/05
 - Citizen Advisory Committee Resolution Related to the Athletic Facility Proposed by DeLaSalle on Nicollet Island, adopted 10/4/05 on a 10-8 vote.
4. Letter from Steven M. Christenson, dated 7/25/06 (Mr. Christenson also included the letters from the National Park Service and the Minnesota Historical Society referenced in the body of this report).
5. Letter from W.J. Janssen-Walraven, dated 6/5/06
6. Letter and attachments from John Chaffee, dated 7/28/06
7. Description of the information in the DeLaSalle application binder.
8. DeLaSalle application binder (paper copies provided to the HPC Commissioners; refer to Attachment 7 for information how to access all of the documents contained therein)



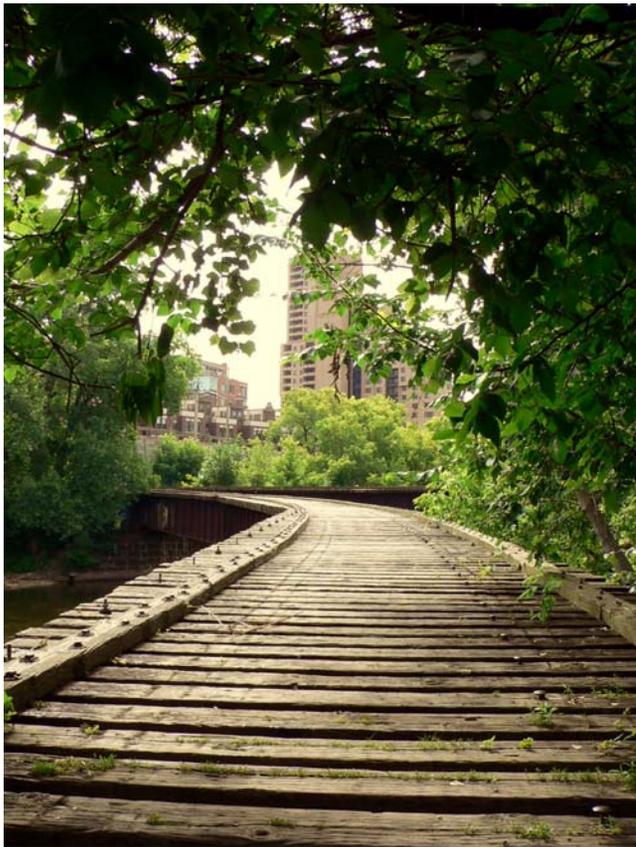
Views of the original DeLaSalle High School buildings





Views of the railroad trench and retaining walls





RESOLUTION RELATED TO
THE ATHLETIC FACILITY PROPOSED BY DELASALLE ON NICOLLET ISLAND

WHEREAS, the Park Board recognizes that all parties involved in discussions of the use of Nicollet Island have the best interests of the island and students of DeLaSalle High School in mind; and,

WHEREAS, the Park Board desires a thoughtful discussion, resolution and agreement for the use of Nicollet Island that is consistent with its desire to preserve green space while also providing recreational opportunities for children and adults in Minneapolis; and,

WHEREAS, for 106 years DeLaSalle High School has played and continues to play a significant role in the history of Nicollet Island and in the education of a diverse and multi-cultural group of 800 students from throughout the Twin City Metropolitan Area; and

WHEREAS, a critical component of DeLaSalle High School's continuing vitality is to provide its students the ability and opportunity to participate in school sponsored physical education programs, youth sports and organized high school athletics; and

WHEREAS, DeLaSalle has demonstrated the need for and interest in developing an athletic field on Nicollet Island in cooperation with the Park Board that will provide facilities for DeLaSalle students and all residents of the City; and

WHEREAS, the MPRB believes that the construction of an athletic field adjacent to DeLaSalle, if certain conditions are met and full public involvement is sought, appears to be in the best interests of the Minneapolis park system and the residents of Minneapolis;

WE NOW RESOLVE that the Park Board is considering entering into a Reciprocal Use Agreement with DeLaSalle High school after or in conjunction with a review of designs for an athletic facility on Nicollet Island provided that certain conditions are met;

BE IT FURTHER RESOLVED THAT nothing in this Agreement shall be construed to give DeLaSalle approval to proceed with demolition or construction for a project which is definite or site specific and nothing in this Resolution can be construed to allow a project to be started or begun;

BE IT FURTHER RESOLVED THAT the Reciprocal Use Agreement which has been discussed is a DRAFT ONLY and will likely be amended to reflect changes in facility layout, content and use after citizen involvement, and does not take effect;

BE IT FURTHER RESOLVED THAT DeLaSalle must meet the following conditions before the Park Board acts on the Draft Reciprocal Use Agreement and facility approval and those conditions are:

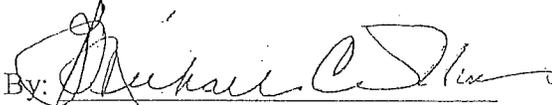
- 1) The Park Board will initiate a Citizens Advisory Committee (CAC) to review all aspects of the project including the detailed site plan, design, location, and use of the proposed athletic facility. The CAC will also consider options that may include moving of facilities to adjacent parkland. The MPRB reserves and retains all its rights under its citizen advisory committee ordinance and other ordinances to grant or deny approval of any proposed project or redevelopment on the MPRB Property.
- 2) DeLaSalle shall prepare a detailed preliminary site plan that the CAC can react to and work from as a starting point to the design process. It is expected that this plan will be modified with CAC involvement.
- 3) It is understood that an Environmental Assessment Worksheet (EAW) will be performed related to the project prior to approval by MPRB. DeLaSalle agrees to pay for the costs associated with the environmental review of the project and will avoid or mitigate any adverse effects of the project.
- 4) DeLaSalle agrees to follow and adhere to all environmental laws, rules and regulations that may apply to any facility to be located in whole or in part on MPRB Property.
- 5) DeLaSalle shall be solely responsible for and shall bear all costs, including attorney fees, for securing the release of any claim or restriction on land use that the State of Minnesota or any of its political subdivisions may have to any portion of the MPRB Property.
- 6) DeLaSalle shall provide the MPRB with a financing plan for the construction of the athletic facility and any other costs associated with the project, i.e. relocation of existing facilities etc. prior to commencement of construction of the project and provide the necessary bonds and assurances necessary to the Board.
- 7) DeLaSalle shall commence construction of the project within 24 months of the date upon which the final approval of a project has been granted.

BE IT FURTHER RESOLVED THAT until all conditions relating to this Resolution have been met to the sole satisfaction of the MPRB, no legal right, interest, claim or title land owned by the Park Board will have accrued, or be transferred to DeLaSalle under this Resolution;

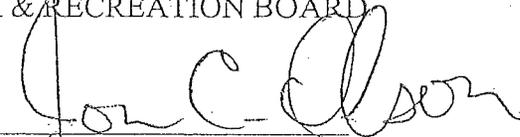
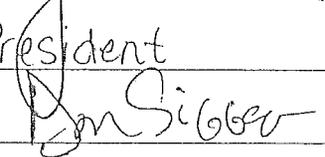
BE IT FURTHER RESOLVED THAT DeLaSalle understands that the Park Board or any other governmental agency is not prejudiced by this Resolution to seek changes to, modification of or rejection of any plan that DeLaSalle may make with respect to the MPRB Property.

IN WITNESS WHEREOF, the parties execute this Agreement as of this 29 day of August, 2005.

DELASALLE HIGH SCHOOL
One DeLaSalle Drive
Minneapolis, Minnesota

By: 
Brother Michael Collins, FSC
Its: President

THE CITY OF MINNEAPOLIS,
Acting by and through its
PARK & RECREATION BOARD

By: 
Its: President
By: 
Its: Secretary

DU
Resolutions
and Agendas

CITIZENS ADVISORY COMMITTEE
RESOLUTION RELATED TO THE ATHLETIC FACILITY
PROPOSED BY DELASALLE ON NICOLLET ISLAND

WHEREAS, pursuant to that certain RESOLUTION RELATED TO THE ATHLETIC FACILITY PROPOSED BY DELASALLE ON NICOLLET ISLAND dated August 17, 2005 (the "Park Board Resolution") the Minneapolis Park and Recreation Board ("Park Board" or "MPRB") resolved to create the DeLaSalle Athletic Field Citizen Advisory Committee (CAC) for the purpose of reviewing proposed designs for an athletic facility and associated improvements to be constructed on Nicollet Island in part on DeLaSalle High School land and in part on Park Board land adjacent to DeLaSalle High School (as more fully described below and in the Concept Plan attached to this Resolution as Exhibit A, the "Project") as follows:

The Park Board will initiate a Citizens Advisory Committee (CAC) to review all aspects of the project including the detailed site plan, design, location, and use of the proposed athletic facility. The CAC will also consider options that may include moving of facilities to adjacent parkland. The MPRB reserves and retains all its rights under its citizen advisory committee ordinance and other ordinances to grant or deny approval of any proposed project or redevelopment on the MPRB Property.

and;

WHEREAS, the Park Board Resolution was based on the following Park Board findings:

WHEREAS, a critical component of DeLaSalle High School's continuing vitality is to provide its students the ability and opportunity to participate in school sponsored physical education programs, youth sports and organized high school athletics; and

WHEREAS, DeLaSalle has demonstrated the need for and interest in developing an athletic field on Nicollet Island in cooperation with the Park Board that will provide facilities for DeLaSalle students and all residents of the City; and

WHEREAS, the MPRB believes that the construction of an athletic field adjacent to DeLaSalle, if certain conditions are met and full public involvement is sought, appears to be in the best interests of the Minneapolis park system and the residents of Minneapolis; and

report
WHEREAS, DeLaSalle High School (A) prepared and presented to the CAC five (5) alternative site plans for the Project (presented by DeLaSalle as Concept Plans A, B, C, D, and E), each partially on DeLaSalle Property and partially on parkland adjacent to the DeLaSalle Property and (B) presented a verbal analysis of alternative Park Board sites that are not on Nicollet Island and adjacent to the DeLaSalle Property, including B.F. Nelson Fields, Van Cleve Park, Fort Snelling, Bryn Mawr, and Parade Stadium; and

WHEREAS, the CAC has considered the programmatic needs of DeLaSalle High School and the Park Board, and the potential impacts of the athletic facility on traffic, safety, historical resources, the natural environment and the current businesses and residents of Nicollet Island, and has determined that the programmatic needs of DeLaSalle and the Park Board cannot reasonably be accommodated on land that is not adjacent to Nicollet Island; and

WHEREAS, the CAC has determined it is appropriate for the Park Board and DeLaSalle to proceed with further analysis and design development of the Project, under the municipal approval process, including preparation of an environmental impact statement ("EA/W"), to determine (A) whether the facility complies with applicable land use controls and restrictive covenants, (B) whether the project has a potential for significant environmental effects (including adverse effects on historical resources), and, if so (C) whether such adverse impacts, if any, can be avoided or mitigated; and

WHEREAS, the CAC has reviewed the five alternative site plans DeLaSalle developed and presented to the CAC and determined that the Concept Plan attached to this Resolution as Exhibit A (the "Final Concept Plan") best addresses existing conditions on Nicollet Island while accommodating the programmatic needs of DeLaSalle High School and the park system, while minimizing disturbance to existing natural, historical infrastructure and traffic patterns; and

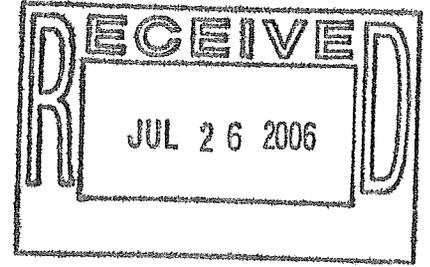
WHEREAS, the Project includes streetscape, landscape, and parking improvements to the DeLaSalle property and Park Board Property around the proposed athletic facilities and along East Island Avenue, including the existing gravel parking lot on Park Board land between the Mississippi River and East Island Avenue, which will reduce the area of impervious surfaces and therefore reduce untreated runoff to the River, all as illustrated or described in Exhibit A; and

WE THEREFORE NOW RESOLVE that the CAC recommends approval by the Park Board of the Final Concept Plan attached to this Resolution as Exhibit A as the "proposal" DeLaSalle will use as the basis for proceeding with environmental review and other governmental approvals, with the cooperation and support of the Park Board; and

BE IT FURTHER RESOLVED THAT the CAC acknowledges that the Final Concept Plan is a preliminary design and recommends that the Park Board review and approve changes to the Final Concept Plan that are necessary to avoid or mitigate potentially adverse environmental impacts of the Project, if any are identified in the environmental review process, or necessary to comply with Park Board regulations, the conditions stated in the Park Board Resolution, and other applicable law, provided the Park Board shall create a new CAC to review any such changes that are not substantially consistent with the Final Concept Plan; and

BE IT FURTHER RESOLVED THAT the CAC recommends that after the environmental review process is completed, the Park Board determine in consultation with DeLaSalle whether the field surface shall be natural turf or artificial turf, after considering the drainage characteristics, environmental impacts, and durability of each.

Steven M. Christenson
171 E. Island Ave.
Minneapolis, MN 55401
612-379-4524 -- lhondros@visi.com



July 25, 2006

Commissioner Phillip Koski
Minneapolis Heritage Preservation Commission
350 S. 5th Street, City Hall Room 210
Minneapolis, MN 55415

Re: Save Grove Street! - Nicollet Island - St. Anthony Falls Historic District

Dear Mr. Koski:

On August 8, you will hear a Certificate of Appropriateness request for an athletic facility development that will close 140-year old East Grove Street and bulldoze a hill on Historic Nicollet Island. The suburban-style stadium proposal includes a large retaining wall, stadium seating, and lights out of scale with Nicollet Island's unique but fragile historic and natural character. Please deny the request.

Because of St. Anthony Falls Historic District's appeal, my wife and I renovated one of the historic homes on Nicollet Island during 1990-1991. As you can see from the enclosed photo, our historic home (one of the Loberg houses) was in bad shape. With guidance from HPC members and staff, we invested a six-figure sum in restoring our small home to 1875 condition. People thought we were foolish to get involved with a risky, complicated, and expensive historic preservation project, especially where the land-lease makes typical bank mortgages hard to get. Unlike typical homeowners, we can profit very little from our investment under the ground lease terms. If we sell the house, 1/3 of any gain goes to the Park Board and 1/3 of any gain goes to the City. We pay normal real estate taxes on both the land and building like any other homeowner in Minneapolis - \$4,819.17 this year. Despite these financial disincentives, my family chose to invest in something that we strongly believe in -- preservation of historic resources for future generations.

In making our personal commitment, we relied on promises that the HPC would ensure historical integrity of the District by strictly enforcing the rules on all Nicollet Island properties. Over the years, we have been happy to partner with the HPC and historical experts in careful treatment of every porch, window mullion, and other detail. The smallest inappropriate changes can have an adverse impact on the District's historical integrity. With the care that we have used in restoring our homes, in partnership with the HPC, we cannot understand how demolition of the historic cultural landscape could be allowed.

July 25, 2006

Page 2

Grove Street matters! Since 1866, Grove Street has anchored the island's cultural landscape. See 1885 and 1892 plates. Even the historian hired by the developer concluded "Closure of this portion of Grove Street will constitute an adverse impact on the historic district."

People interested in historic preservation consistently have expressed concern about this proposed development. So you can see their own words, I enclose comment letters from the National Trust for Historic Preservation, Preservation Alliance of Minnesota, and other people and organizations interested in historic preservation and environmental conservation.

I have two school-age boys and support the general goal of opportunity for athletic recreation in Minneapolis. In this case, however, other reasonable options are available that have not been adequately considered.

Please deny the Certificate of Appropriateness request. Thank you for your time and your work to help preserve historic resources in Minneapolis.

Sincerely,



Steven M. Christenson

C: HPC Commissioners

Enclosures:

1. Photos of Historic Loberg House before and after renovation
2. Photo of Grove Street - <http://www.mnpreservation.org/angered2006/index.php>
3. Nicollet Island, 1885 plate and 1892 plate
4. U.S. Department of Interior, National Park Service (Nov. 23, 2005)
5. Minnesota Historical Society, SHPO (Nov. 23, 2005)
6. Preservation Alliance of Minnesota (Nov 22, 2005)
7. National Trust for Historic Preservation (Feb. 14, 2006)
8. Friends of the Mississippi River (Nov. 14, 2005)
9. Sierra Club (Nov. 23, 2005)
10. Robert P. Mack (Aug. 9, 2005)
11. Robert P. Roscoe (July 25, 2005 & Nov. 15, 2005)
12. Louise Erdrich Commentary, reprinted from Star Tribune (May 2006)

Loberg House (1875)
171 East Island Avenue
Winter 1991



July 2006







United States Department of the Interior

NATIONAL PARK SERVICE
Mississippi National River and Recreation Area
111 E. Kellogg Blvd., Ste. 105
St. Paul, Minnesota 55101-1256

IN REPLY REFER TO:

L8017(MISS)-3

November 23, 2005

J. Michael Orange
Principal Planner
Minneapolis Planning Division
Community Planning and Economic Development
City Hall, Room 210
350 South Fifth Street
Minneapolis, MN 55415-1385

Dear Mr. Orange:

This letter contains comments from the National Park Service (NPS) on the Environmental Assessment Worksheet (EAW) for the proposed DeLaSalle High School Athletic Facility Project. As indicated in the EAW, the entire project area, including all of Nicollet Island, the Mississippi River, and adjacent upland areas in the vicinity of the proposed project, is located within the Mississippi National River and Recreation Area (MNRRA), a unit of the national park system. The MNRRA was established by Congress in 1988 to protect, preserve, and enhance the significant values of the Mississippi River corridor through the Twin Cities metropolitan area. As also identified in the EAW, a Comprehensive Management Plan (CMP) for the MNRRA was approved in 1995. The CMP provides a policy framework for the coordinated efforts of federal, state, and local authorities, as well as the general public, to protect and interpret the nationally significant resources of the corridor and for analyzing plans and individual actions in the area. In our review of the EAW, we find the project inconsistent with several key MNRRA CMP policies and guidelines:

1) The proposed athletic complex is not in keeping with the CMP's general criteria for compatible riverfront uses. The CMP gives special emphasis to protection of areas along the riverfront due to the high concentration of significant natural, cultural, and economic resources, its potential for outdoor recreation, and a greater probability for serious adverse effects if not properly managed. It is our belief that the proposal does not demonstrate a clear need for a riverfront location; that is to say, the proposed facility is not reliant upon the river, a riverfront location, or a connection to the river for its operational needs or economic benefit. There also seems to be significant potential for conflict with established uses—particularly those of a more quiet and passive nature—on Nicollet Island and other areas within the Saint Anthony Falls Historic District, as well as potential inconsistencies with the character of nearby residential neighborhoods and components of the adjacent regional park system on, and adjacent to, the

island. Further, we expect the proposed project would result in some loss of visual open space, and would interfere with some river views.

2) The proposal is not consistent with CMP goals that stress the preservation of public open space. Open space is a critical resource in the river corridor and its protection and enhancement is stressed in the CMP. The proposal calls for the elimination of existing public open space on land owned by the Minneapolis Park and Recreation Board for the sole benefit of a narrow group of potential users. Such loss of open space is not supported in the plan.

3) The proposal is inconsistent with the historic preservation goals of the CMP. One of the principal purposes for which Congress established the MNRRA was to preserve, enhance and interpret its archeological, ethnographic, and historic resources. Of all the places that convinced Congress to establish MNRRA, the St. Anthony Falls Historic District is one of the most important.

No place anchors the metro Mississippi River's historical significance like St. Anthony Falls. Geologically, it is unique; St. Anthony Falls is the only major waterfall on the Mississippi River. According to Dakota tradition, the falls are home to Oanktehi, the spirit of waters and underworld. For the Dakota, Nicollet Island was once an important place for harvesting maple syrup. Historically, visitors to the falls comprise a who's who of European and American exploration: French explorer Father Louis Hennepin, English colonist Jonathan Carver, and Zebulon Pike, the first American explorer to portage around the falls 200 years ago. Its painters include George Catlin, Henry Lewis, Alexis Fournier, and Albert Bierstadt.

Economically, the falls created a city with no peer west of Chicago to the Rocky Mountains and south to St. Louis. It gave birth to the saw milling and flour milling industries that became the leading producers of their commodities in the United States and, at times, the world. For some 50 years Minneapolis was the nation's flour capital. Technologically, the falls produced the first commercial hydroelectric central plant in the United States. The St. Anthony Falls area boasts two National Historic Landmarks: the Pillsbury A Mill and the Washburn A Mill. They bookend James J. Hill's remarkable stone arch bridge, which is a National Engineering Landmark.

For all the above reasons, the greater St. Anthony Falls area is a National Register of Historic Places District. Resting at the tip of the St. Anthony Falls horseshoe dam, Nicollet Island lies near the heart of all of this history. What happens here affects all that surrounds it.

The proposed DeLaSalle Stadium development would adversely affect the St. Anthony Falls Historic District in a number of ways. Grove Street is one of the physical anchors that define the historic setting of Nicollet Island. Its presence on the island since the late 1860s grounds us in how historic events developed along and around it. Grove Street is one of the few through streets on the island, running from one side of the island to the other. As such, it is a defining feature of the island's landscape which helps to interpret important aspects of the island's history. It does not require buildings lining the eastern end to serve this purpose.

As designed, the project would have additional adverse effects beyond destroying a large section of Grove Street. The design calls for bleachers to be built across the road alignment. This would

present a serious visual obstruction to what was once a clear line of sight down the road, destroying the visual role the road played as one of the through streets on the island.

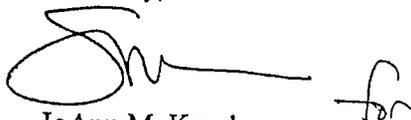
The proposed high mast lighting would also adversely affect the historic district, particularly since the island has 360 degree visibility. The structures and stadium lights would be out of character with the historic district and would be visible from all directions.

Finally, the archeological report completed by Dr. Michelle Terrell demonstrates that a high potential for archeological sites exists in some areas of the proposed project. If National Register eligible sites exist in the project area, they could be adversely affected by the project. Given the benefits of the stadium project stated in the EAW, we believe those benefits simply do not justify the adverse effects on the St. Anthony Falls Historic District. The District is significant at the local, state, and national levels and the project would only benefit a relatively small, local group of users.

In conclusion, though we recognize that the proposed facility would be a convenience for the operation of the DeLaSalle High School athletics program and could help the Minneapolis Park and Recreation Board in meeting some of its program needs, the proposal nonetheless is inconsistent with riverfront location guidelines, open space protection goals, and historic preservation purposes identified in the MNRRA CMP. In accordance with the CMP, new activities that do not need a river location, that do not contribute to the riverfront environment, or that would cause some environmental degradation or have some other detrimental effects on corridor resources, should be located outside the riverfront area. We recommend that other alternatives be more seriously evaluated to meet the proposers' needs, including an alternate location for a new stadium complex in a less sensitive area, or use of existing facilities. If the project is approved where proposed and the proposers elect to proceed, we strongly recommend that an unlighted stadium design be implemented. We also recommend that an archeological survey and evaluation be completed before a final decision on the stadium project is made.

Thank you for the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the proposed DeLaSalle High School Athletic Facility Project. If you have any questions concerning our comments please contact me or Jim Von Haden at 651-290-3030, ext. 235.

Sincerely,



JoAnn M. Kyral
Superintendent

cc:

Brother Michael Collins, DeLaSalle High School
Minneapolis Park and Recreation Board
Dennis Gimmestad, Minnesota Historical Society
Greg Mathis, Minneapolis Heritage Preservation Commission



MINNESOTA HISTORICAL SOCIETY
State Historic Preservation Office

November 23, 2005

Mr. Michael Orange
Principal Planner
City of Minneapolis
210 City Hall
350 South 5th Street
Minneapolis, MN 55415

Re: EAW – DeLaSalle Athletic Facility
Minneapolis, Hennepin County
SHPO Number: 2006-0280

Dear Mr. Orange:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project. It has been reviewed pursuant to responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act and through the process outlined in Minnesota Rules 4410.1600.

Please note that the following comments are addressed to the city as the Responsible Governmental Unit for this project. We hope that they are useful to the city in dealing with historic preservation issues as part of the local permitting and decision-making process. Based on the information in the EAW, the project does not appear to have any involvement by federal or state agencies, and, therefore, it does not appear that the State Historic Preservation Office (SHPO) has an independent continuing review of the proposal. Some portions of the EAW (and supporting documents) are not clear on this point and imply a continuing SHPO review. It is important that the city understand that this is indeed *not* the case, and that the city needs to comprehensively address historic preservation issues as part of local review and approval processes.

All of Nicollet Island is located within the St. Anthony Falls Historic District, which is listed on the National Register of Historic Places and has been designated under the Minnesota Historic Districts Act. In addition, Nicollet Island itself has been designated under the Minnesota Historic Sites Act.

In the mid 20th century, the central area of Nicollet Island underwent a drastic change. The rows of commercial and residential buildings along Hennepin Avenue were removed, and the bridges across the river channels were replaced. Despite these changes, however, the historic character of the northern half of the island has survived, and two historic buildings, archaeological sites, and considerable open space remain on the southern end. Overall, the island maintains strong associations and patterns important to early riverfront history in Minneapolis. These attributes are detailed in the Historic Resources Survey report prepared by Landscape Research (October 2005).

We conclude that the proposed stadium would have a significant adverse effect on the historical character of the island and on the St. Anthony Falls Historic District. Grove Street currently establishes a strong visual and functional demarcation for the northern portion of the island. Here, the original 1860s street patterns are intact, as is the overall character of a residential neighborhood bordered by riverbanks. By removing half of the length of the original 1866 Grove Street, paving over portions of the riverbank area, and introducing a new structure of a scale and configuration not in keeping with the area's historic patterns, the feeling and character of the island would be substantially diminished. In this regard, we disagree with several of the conclusions presented in the response to question 25a of the EAW – namely that that the project will not have an adverse impact on the Grove Street Flats, the Nicollet Island Residential Area, or the St. Paul and Northern Pacific Railroad. On the contrary, we think that the feeling and setting of these areas and the island would be adversely impacted. Among the factors contributing to this impact are potential changes in volumes and patterns of traffic, increased lighting, and general intensification of land use.

Further, we concur with the recommendations of the Two Pines Resource Group regarding archaeological resources. As indicated in the EAW, their October 2005 report concludes that there is good potential for significant pre-contact and contact period archaeological sites in the project area, including the area proposed for parking along the riverbank. Additional archaeological work is needed before undertaking any terrain alteration of this area.

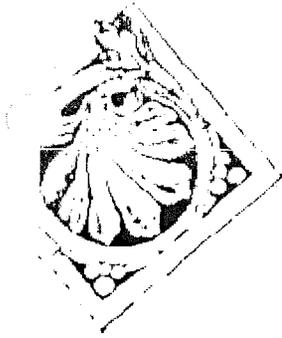
If we can be of assistance to the city as the historic properties issues of this proposal are addressed, please contact us at 651-296-5462.

Sincerely,



Britta L. Bloomberg
Deputy State Historic Preservation Officer

cc: Greg Mathis, Minneapolis Heritage Preservation Commission
John Crippen, St. Anthony Falls Heritage Board
Jon Gurban, Minneapolis Park and Recreation Board
Michelle Terrell, Two Pines Resource Group
Carole Zellie, Landscape Research
Roger Randall, Preservation Alliance of Minnesota



Preservation Alliance of Minnesota

"...to preserve, protect and promote Minnesota's historic resources"

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Bonnie C. McDonald

Board of Directors
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Will Stark –
Saint Paul

Claire Stokes –
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Patricia A. Trocki –
Eagan

Lyssa T. Washington
Minneapolis

Mary L. Wingerd, Ph.D. -
Saint Paul

**MN Advisors to the
National Trust for
Historic Preservation**

Roger Brooks, Ph.D. –
Saint Paul

Carolyn Sundquist –
Duluth

Honorary Director

Richard T. Murphy, Sr. –
Saint Paul

Magazine Editor

Bob Glancy –
Minneapolis

Office Volunteer

Marvel Anderson –
Rush City

November 22, 2005

(Hard copy to follow by mail)

J. Michael Orange, Principal Planner
Minneapolis Planning Division
City of Minneapolis
City Hall Room 210
350 S. 5th Street
Minneapolis, MN 55415-1385

Dear Mr. Orange:

On behalf of the Preservation Alliance of Minnesota, I am writing to comment on the Environmental Assessment Worksheet (EAW) for the DeLaSalle High School Athletic Facility. The Alliance is Minnesota's only statewide, membership-based nonprofit preservation organization in Minnesota and it is our mission is to preserve, protect, and promote Minnesota's historic resources.

DeLaSalle's proposed athletic facility is located within the St. Anthony Falls Historic District, recognized in the National Register of Historic Places and as a local historic district. The EAW indicates that only the closure of Grove Street would have an adverse impact on the historic district. We ask that the City of Minneapolis prepare an Environmental Impact Statement to reconsider how the athletic facility's scale, structures, and lighting fixtures will relate to, and impact, the historic feeling and setting of its adjacent small-scale residential properties.

Furthermore, the EAW indicated that the athletic facility has the potential to contain archaeological resources that may also be significant. Although the EAW states that DeLaSalle would consult with appropriate agencies regarding a program for archaeological investigation, it does not propose ways to avoid and mitigate the adverse impact. Nor does the EAW address measures to avoid and mitigate the impact by the closure of Grove Street. Appropriate measures of avoidance or mitigation should be clearly specified in the EAW or Environmental Impact Statement.

(cont.)

Finally, the Alliance requests that the City reassess the impact of the project within the whole of the St. Anthony Falls Historic District. The EAW indicates that no additional cumulative impacts are known at this time. The Alliance suggests that the proposed project should be considered in relation to other current and proposed projects within the St. Anthony Falls Historic District. These projects, of which the DeLaSalle Athletic Field is one, may be considered to have a cumulative adverse impact to the historical integrity of the entirety of the historic district. Such considerations should be addressed in an Environmental Impact Statement.

Thank you for the opportunity to comment on the EAW for the DeLaSalle Athletic Facility. The Alliance recognizes the significant contribution that DeLaSalle has made to Minneapolis' history and the school's need to provide for athletic facilities. However, we encourage school leaders and those reviewing this project to consider alternate sites that will not adversely impact our invaluable historic resources.

Sincerely,

Roger D. Randall
Chair

cc: Steve Christenson, PAM Member
Greg Mathis, City of Minneapolis HPC
Dennis Gimmestad, Minnesota SHPO

MIDWEST OFFICE



NATIONAL TRUST
for HISTORIC PRESERVATION

February 14, 2006

Minneapolis Park and Recreation Board
2117 West River Road
Minneapolis, MN 55411

Re: Proposed DeLaSalle High School Athletic Facility

Dear Commissioner:

The National Trust is a private, nonprofit membership organization dedicated to protecting the irreplaceable. Recipient of the National Humanities Medal, the Trust was founded in 1949 and provides leadership, education and advocacy to save America's diverse historic places and revitalize communities. Its Washington, D.C. headquarters staff, six regional offices and 26 historic sites work with the Trust's 270,000 members and thousands of local community groups in all 50 states.

As Director of the Midwest Office of the National Trust for Historic Preservation, I would like to commend you for years of responsible stewardship of your properties on Nicollette Island. We are however deeply concerned by the current proposal being considered by your Board. I urge that you reconsider the potential reciprocal lease agreement between the Park and Recreation Board and DeLaSalle High School for the proposed development of a new DeLaSalle High School Athletic Field.

Based upon the research and findings of the Environmental Assessment Worksheet prepared by the City of Minneapolis, it is clear that this proposed new athletic field—with its associated parking, lighting, and the required vacation of Grove Street—will have a negative impact upon its surroundings.

Protecting the Irreplaceable

53 WEST JACKSON BOULEVARD • SUITE 350 • CHICAGO, ILLINOIS 60604
312.939.5547 • FAX: 312.939.5651 • WWW.NATIONALTRUST.ORG

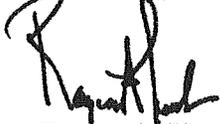
Serving: IL, IN, IA, MI, MN, MO, OH & WI

The proposed new fields would be located squarely within the St. Anthony Falls Historic District, a locally designated landmark district. The many small-scale residential properties organized around a prominent street grid pattern define the character of the district, the significance of which has also been recognized with designation on the National Register of Historic Places.

A new, large-scale athletic facility in the proposed location will disrupt the established visual character and circulation patterns of this special place, and has the potential to overwhelm the surrounding structures through its sheer scale. Such an outcome would inflict irreparable harm to one of Minnesota's oldest historic districts. We ask that the Board consider all other possible alternatives for the expansion of the DeLaSalle Athletic Fields before committing to the current proposed site.

Please do not hesitate to contact me if there is any way that our office could be of assistance to you as you continue to explore your options.

Sincerely,

A handwritten signature in black ink, appearing to read "Royce A. Yeater". The signature is stylized and cursive.

Royce A. Yeater, AIA
Midwest Director

C: Bonnie McDonald, Preservation Alliance of Minnesota
Britta Bloomberg, Minnesota Historical Society



Friends of the Mississippi River

46 East Fourth Street, Suite 606 • Saint Paul, MN 55101-1121 • 651/222-2193 • Fax 651/222-6005

Working to protect the Mississippi River and its watershed in the Twin Cities Area.

November 14, 2005

Michael Orange, Principal Planner
City of Minneapolis
210 City Hall
350 South Fifth Street
Minneapolis, MN 55415

Dear Mr. Orange,

Please accept the following comments from Friends of the Mississippi River regarding the Environmental Assessment Worksheet for the proposed DeLaSalle High School Athletic Facility.

Item #11. Fish and Wildlife and Ecologically Sensitive Resources. The project is located in the middle of a regional park on the Mississippi River, which is the largest river ecosystem on the continent. Although development has occurred at the site in the past, it is still surrounded by important ecological resources. Nicollet Island provides much needed refugia along the migration route of over 60% of all North American bird species and over 40% of all North American waterfowl. The EAW should acknowledge and mitigate any potential damage to migratory bird species or other wildlife species that would be disturbed by new development, fences, retaining walls and bright lights. The fact that the island is surrounded by dense development and tall buildings makes the habitat on Nicollet Island that much more critical to the birds and wildlife that depend upon it.

Item #14. Water Related Land Use Management Districts. The proposed project is within the State Critical Area and the Mississippi National River Recreation Area (MNNRA). The Shoreland Overlay District of the Minneapolis Zoning Code does not properly address all the requirements of Minnesota State Law regarding the Mississippi River Critical Area. Critical Area also includes standards that apply to impacts to scenic, cultural and historic resources. More specifically, a fenced athletic field is NOT a river-oriented recreational use, nor does it enhance the environment. Taking statements out of context that are not true does not reflect the intent of Executive Order 79-19. The project has the potential to harm the scenic and environmental resources of Nicollet Island, and the EAW should offer solid suggestions for how to mitigate these impacts.

Item #26. Visual Impacts. The project as proposed will have visual impacts on the adjacent park and the river corridor, especially scenic views from the east channel and bank. Specifically, the historic bucolic character of the island will be impacted by an athletic field that is out of character and scale with the rest of the park. "Sense of Place" is a hard thing to measure, but impacts to sense of place will be the most significant ones this project has to the surrounding environment. The City needs to carefully address how this project may impact a visual jewel that benefits the river corridor and adjacent residential development.

Item #27. Compatibility with Plans and Land Use Regulations. See Item #14 above.

In closing, Friends of the Mississippi River would like to encourage the proposer to look at alternative sites for this project, such as the B.F. Nelson site across the river. This area is much more well-suited to an athletic field of this size and would offer more opportunities to mitigate impacts to scenic and natural resources, as well as those from traffic and noise.

Respectfully Submitted,

Irene Jones
Outreach Director
Friends of the Mississippi River
651/222-2193 ext. 11



SIERRA
CLUB
FOUNDED 1892

2327 East Franklin Avenue, Minneapolis, MN 55406
TEL: 612-659-9124 FAX: 612-659-9129 www.northstar.sierraclub.org

— VIA ELECTRONIC MAIL —

Mr. Michael Orange, Principal Planner
City of Minneapolis
210 City Hall
350 South Fifth Street
Minneapolis, Minnesota 55415

November 23, 2005

Re: The Environmental Assessment Worksheet prepared by the City of Minneapolis for the DeLaSalle High School Athletic Facility proposed for One DeLaSalle Drive on Nicollet Island in the City of Minneapolis

Dear Mr. Orange:

Thank you for the opportunity to provide public comment on the Environmental Assessment Worksheet for the DeLaSalle Athletic Facility proposal (Proposal). For the reasons stated below, due to the inadequate consideration of alternatives to the Proposal, and because implementation of the Proposal would likely lead to significant environmental and social impacts, the Sierra Club believes that an environmental impact study for this project is both warranted and prudent.

All of the land on Nicollet Island except the DeLaSalle property, three multi-family residential structures, and the existing rights-of-way, was acquired to create a regional park for the benefit of all the people of Minneapolis and surrounding communities. Further, the park is surrounded by a segment of the Mississippi River that has been designated as "wild and scenic." If the publicly owned open space on Nicollet Island were restored to parkland habitat, it would provide a conservation and recreational 'jewel' amidst a densely populated and highly developed urban and historical area. In contrast, the Proposal would destroy a meadow that contains 21 trees that were planted to commemorate the 150th anniversary of the University of Minnesota.

Additionally, the new facility would introduce a new activity with seating for 750 spectators, lights, and loudspeakers – all of which do not currently exist on this island. The field lighting would be mounted on 70 foot poles, and the applicant acknowledges that the lighting would be visible off site and would intrude on the view of the downtown skyline in the vicinity of the project. Not only will the noise and lighting be problematic for neighboring property owners and visitors, they would likely impact and disrupt migratory and nesting birds on Nicollet Island. It is noteworthy that Nicollet Island is located along the migration route of over 60% of all North American bird species and over 40% of all North American waterfowl.

Further, it is remarkable that the Environmental Assessment Worksheet is totally void of any discussion regarding alternative citing options for the proposed athletic facility. The Sierra Club is greatly concerned that alternative building sites, both on and off Nicollet Island, were not discussed that would generate fewer environmental and social impacts. Overall, the scale of the proposed athletic facility is too large for the available land, as was noted by two landscape architects that served on the Citizen's Advisory Committee. The visual impacts are not compatible or consistent with the historic designation of the district or with the view shed from the river.

Finally, the Proposal would ultimately strip the right to use public land from the citizens of Minneapolis. The Critical Area Plan states that "Nicollet Island should be maintained in a manner which will promote public use and enjoyment for all segments of the population." A Reciprocal Use Agreement that is contemplated between the City of Minneapolis and DeLaSalle High School is not in the best interest of Minneapolis citizens and would limit access to the recreation area. As was discussed in our July 15, 2005 letter to the Minneapolis Park and Recreation Board, the Sierra Club acknowledges DeLaSalle's outstanding reputation in the community and its devotion to educating a wide range of teenagers from all income levels. Nevertheless, this is a debate over a valuable piece of property available now to all citizens of the state, and that would change under the proposed Reciprocal Use Agreement. There is a much greater need for the preservation of open and recreational space on Nicollet Island, which would be open at all times to use by all Minneapolis citizens.

The Sierra Club wishes to express its appreciation for your consideration in reviewing these comments. We look forward to working with you as this project progresses.

Sincerely,

/s Frank Jossi

/s Sharell Benson

Frank Jossi, Co-Chair
Land Use and Transportation Committee
Sierra Club North Star Chapter

Sharell Benson, Co-Chair
Land Use and Transportation Committee
Sierra Club North Star Chapter

MacDonald & Mack Architects Ltd.

Stuart MacDonald, AIA
Robert C. Mack, FAIA

August 9, 2005

Friends of the Riverfront
c/o Ms. Edna Brazaitis
4 Grove Street
Minneapolis, MN 55401

Reference: Proposed Athletic Facility Expansion at De LaSalle High School

Dear Edna:

Thank you for the invitation to comment on De LaSalle High School's proposed expanded athletic facilities. Nicollet Island has been a place of special interest to me since my architectural firm undertook a comprehensive study of the entire St. Anthony Falls area over 25 years ago.

First let me tell you a bit about myself. I am a registered architect who has devoted his entire professional career to the preservation of our cultural resources – mostly buildings but also engineering structures and designed landscapes. I am a principal with MacDonald and Mack Architects, Ltd., and an Adjunct Professor in the College of Architecture and Landscape Architecture of the University of Minnesota. I was elected to the College of Fellows of the American Institute of Architects in 1989 in recognition of my contributions to the field of historic preservation. I recently returned from a year's leave of absence which I spent in Scotland studying Scottish preservation philosophy and techniques.

Early in my professional career I worked with the National Park Service. During that period I assisted in the early preparation of what has become *The Secretary of the Interior's Standards for Rehabilitation* and the associated *Guidelines*. These standards reflect internationally recognized conservation standards such as *The Venice Charter* which have been developed in Europe and the Americas for well over 100 years.

The following comments are based solely on the preservation standards of the project irrespective of any other issues.

Based on my knowledge of the project and of the associated standards, it is my belief that the Minneapolis Park and Recreation Board (MPRB) should not enter an agreement for the proposed athletic facility at least until full designs are

Suite 712
Grain Exchange Building
400 South Fourth Street
Minneapolis, Minnesota
55415

Tel 612 341 4051
Fax 612 337 5843
E-mail info@mmarchltd.co

Exhibit R

complete and the true effect of the project can be evaluated by, among other things, (1) the Minneapolis Heritage Preservation Commission (HPC), (2) the Minnesota State Historic Preservation Office (SHPO), and (3) the Minnesota Environmental Quality Board's (MEQB) selected responsible governmental unit (RGU) for the environmental assessment worksheet (EAW) for the project. Since the MPRB is aware of historic concerns, it would be inappropriate to enter an agreement until preservation concerns can be addressed, and these concerns cannot be evaluated based on the limited materials available thus far.

Two of the "recommended" *Guidelines* accompanying the *Secretary of the Interior's Standards* are as follows:

Identifying, retaining, and preserving buildings and streetscape, and landscape features that are important in defining the overall historic character of the district or neighborhood. Such features can include streets, alleys, paving, walkways, streetlights, signs, benches, parks and gardens, and trees.

Retaining the historic relationship between buildings, and streetscape and landscape features such as a town square comprised of row houses and stores surrounding a communal park or open spa space.

They recommend against:

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

Destroying streetscape and landscape features by widening existing streets, changing paving material, or introducing inappropriately located new streets or parking lots.

There are several aspects of the proposed project as presented on the De LaSalle High School web site, which seem to be in clear conflict with these guidelines. The most obvious is the proposed closing of Grove Street, which does not preserve the streetscape and landscape features and which does radically change features which help define the character of Nicollet Island. In addition, the bleachers will destroy views along Grove Street. Similarly, retaining walls, fencing, and support buildings will radically alter views along East Island Avenue and from the East Bank of the River. Finally, lighting and loudspeakers will create visual and aural conditions which, while not directly related to physical damage to the site, still would be considered a "detrimental effect" within the meaning of the *Standards*, Section 106 of the National Historic Preservation Act, and associated state and local regulations.

Friends of the Riverfront

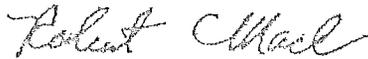
August 9, 2005

Page 3

I empathize with the problems faced by the school. My own high school was nearly two miles from even small facilities such as those present at De LaSalle, so even going to marching band practice (for me) or football practice (for the athletes) was a problem. Now, even 40 years later, I believe that this same situation continues to exist; perhaps it has even become a tradition.

Historic resources, districts in particular, are fragile resources which are too easily "chipped away at" by projects such as this. The St. Anthony Falls Historic District has already had one "redefinition" since its initial listing, caused by inappropriate changes. I believe, therefore, that the damage done to the Nicollet Island portion of the St. Anthony Falls Historic District by the proposed project would be far worse than the inconvenience caused by the current situation.

Sincerely yours,

A handwritten signature in cursive script that reads "Robert C. Mack".

Robert C. Mack, FAIA

Robert Roscoe / Design for Preservation

1401 East River Parkway, Minneapolis, Minnesota 55414 612.317.0989 broscocoe@earthlink.net

July 25, 2005

Marie Hauser
Minneapolis Park Board Commissioner
Minneapolis Park Board
2117 West River Parkway
Minneapolis, MN 55406

Dear Marie:

I am writing this letter to request that the DeLaSalle athletic field expansion on Nicollet Island not be constructed. As you know, Nicollet Island is a historic property as part of the Saint Anthony Falls Historic District. In general, the athletic field as proposed is incompatible with the landscape and structures on the island, especially the athletic fields' size, its required closing of Grove Street, the large obtrusive retaining wall, the distorted rise of topography, and the highly visible lighting fixtures that will greatly disturb the quiet character of the river environment.

Grove Street was platted in 1866, in the earliest beginnings of island settlement by western expansion of the United States. The ability of people walking about the island to comprehend the built and natural environment at eye level has always been a special quality of the island and forms an inherent aspect of the Nicollet Island's historical character.

The Minneapolis Park Board has always been a wise and careful steward of its properties that form an integral part of the city's heritage, but this proposal would be an unfortunate departure from the Park Board's long-standing service to maintain its cultural resources. Please re-consider your support for this enlargement that would be so out of scale and out of character with the special place Nicollet Island has been to the people of Minneapolis, the region and our state.

Sincerely,



Robert Roscoe

Robert Roscoe / Design for Preservation

November 15, 2005

J. Michael Orange, Principal Planner
Minneapolis Planning Division
Community Planning & Economic Development Department
City Hall Room 210
350 S. 5th Street
Minneapolis, MN 55415-1385

**R e : Environmental Assessment Worksheet (EAW) for DeLaSalle Athletic
Facility Development Project, Nicollet Island, Minneapolis**

Dear Mr. Orange:

This letter relates to the draft EAW for the proposed athletic facility development project on Nicollet Island within the St. Anthony Falls Historic District in Minneapolis. As background, I served on the Minneapolis Heritage Preservation Commission (HPC) for 21 years and worked extensively on many historic preservation aspects of Nicollet Island during those years. Also, my professional work on Nicollet Island included design for renovation of 6 houses, one new infill structure, and one addition.

One aspect of the EAW immediately jumps out at me - the EAW either deliberately or inadvertently understates the issue by setting up components of Nicollet Island to be analyzed as discrete parts, not in the totality in which its historic importance lies. For instance, the EAW text implies that closing East Grove Street has no impact on the physicality of the houses or the historic district. The real issue is how its removal affects the historic integrity of the whole island. The EAW should consider the historical impacts of the proposed development within an embrace of the larger picture, which the developer avoids doing for its own purpose.

A key attribute of a designated historic property is its uniqueness. This attribute has been used over and over to describe Nicollet Island. Nicollet Island is the only inhabited part of Minneapolis completely surrounded by water. Sitting astride the Mississippi River at the head of Saint Anthony Falls, the island is a witness to the entire span of the city's history. The island itself functioned as a sort of fulcrum to leverage city growth from Saint Anthony across the river to land that became an upper Midwest prairie metropolis. Perhaps Nicollet Island's most unique characteristic is its enduring strength in a seeming self-preservation of its natural features amidst the dramatic alteration of the built environment on the island itself and the riverfront around it.

That strength has been guided by the hand of civic interest and dedication, which the City should apply today. In this case, the proposed athletic field is incompatible with the landscape and structures on the island, especially the closing of East Grove Street, the large obtrusive retaining wall, the distorted rise of topography, and the highly visible lighting fixtures that will greatly disturb the quiet character of the river environment. The proposed development is simply too big for this small island location. To evaluate

alternatives that would mitigate these significant environmental impacts, the City should require preparation of an Environmental Impact Statement (EIS).

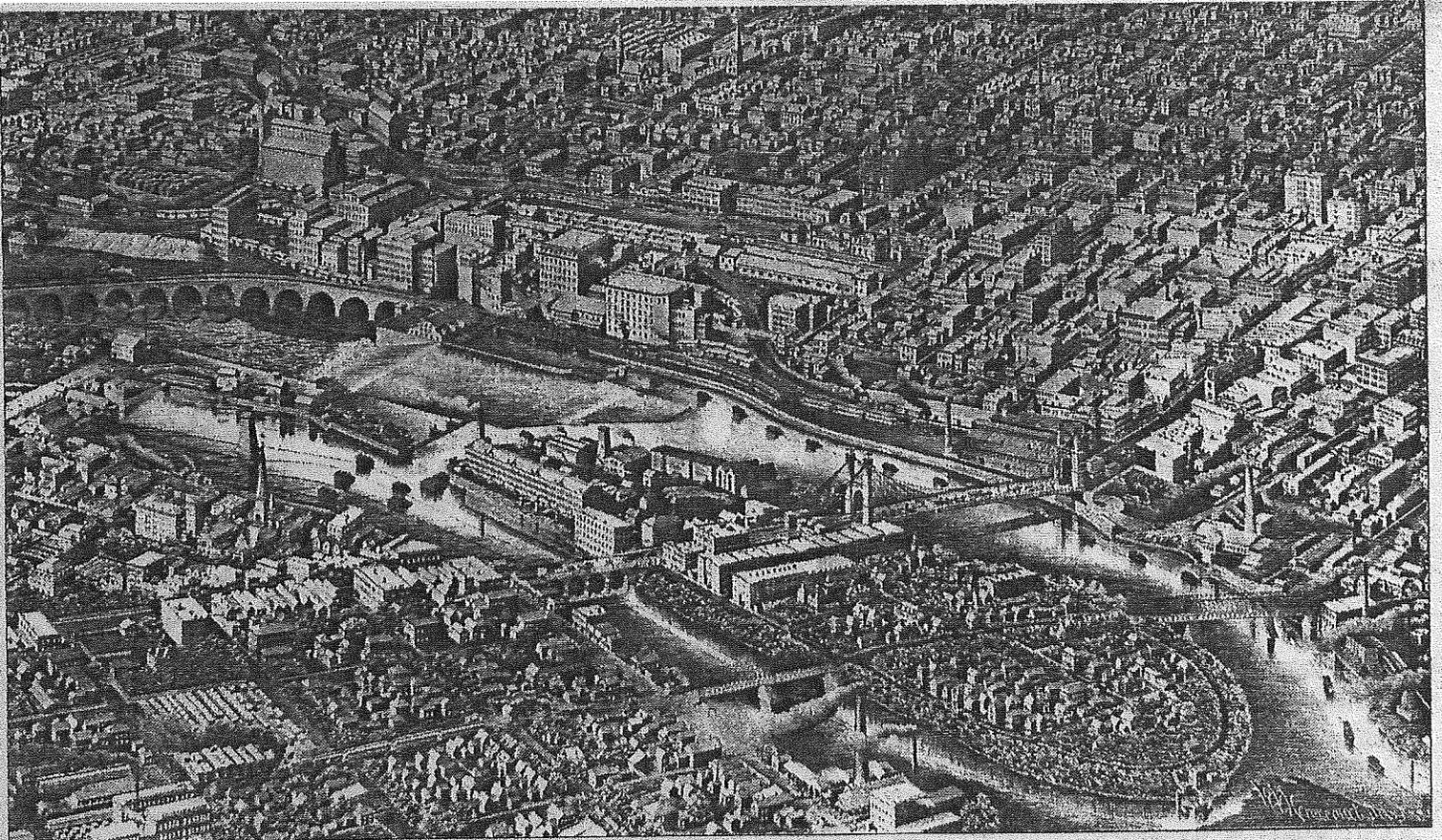
Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Robert Roscoe". The signature is written in black ink and is positioned above the printed name.

Robert Roscoe

C: Dennis Gimmestad, SHPO
Greg Mathis, Minneapolis HPC



An early drawing of Nicollet Island: An extraordinary and vital piece of Minnesota history.

Preserve this island's rare character

- Instead of giving it over to a high school playing field, think what this precious site can teach students today.

By LOUISE ERDRICH

The decision whether or not to build a football field on Nicollet Island is not a NIMBY issue, it is everyone's issue, for Nicollet Island is everyone's backyard. Although I do not live near, I walk the quiet streets and sit by the river when I need peace. Often, I take family along, and every time a person comes to visit, I bring them to see Nicollet Island because of its rare charm. To have a place in the center of Minneapolis where you can hear the wind blow and the river roll by is a treasure.

I was a football fan in high school when our North Dakota team won the state championship — I was even a cheerleader. It was a lot of fun, but I can't say I learned vital lessons or even think about it anymore. What I do think about was the time my history teacher took us to the banks of the Sheyenne River. We dug petrified buffalo fossils, thousands of years old. I have mine to this day, on my writing desk. A piece of life caught in time.

What I am saying is this: If a school real-

ly, truly, wants to use this site to improve the character of its students, use it to think about and reconstruct our city's extraordinary history. Learn what Nicollet Island was, first to its Native inhabitants, the Dakota and the Ojibwe who settled and traded there, and then to the boom town of St. Anthony. Digging on Nicollet Island should require an archeological team, a permit, and many years of thought. But students could study it right now.

Our city is famous for its parks and its quiet places, and for the visionary conservationists who understood there is nothing as precious as open space. The island is a rare and vital piece of Minnesota history, and its character should never be lost.

Here is a recollection of the island by a woman who saw it change during the boom years, and remembered its original 1853 beauty, some of which has miraculously returned. Mrs. Rebecca Cathcart wrote "that Island had only one house on it, and that one built of logs: it was also heavily wooded, and in its wild state very beautiful. There was no bridge connecting it with the main land; the crossing had to be made on the pine logs lying in the mill dam."

The lady who lived in the log cabin was a marvelous musician, and as a girl, Mrs. Cathcart had crossed a dangerous log jam every

day to take lessons from her. She wrote, in 1913, "When I visit the city of Minneapolis and see Nicollet Island, with its streets and row upon row of houses, street cars crossing it, and bridges on either side, I think progress is all utilitarian. No grand cataract, no magnificent forests, no majestic river are there now; but everything has been found and fettered, to add to the wealth and comfort of man. I am glad I lived in the wild days when nature reigned supreme."

How extraordinary that nature has regained even a little foothold in the middle of our city, and how very shortsighted it would be to pave it over, even with good intentions. All of the people in our city deserve this place in perpetuity. I was raised a Catholic, and have meditated often on the concept of grace — there are many kinds according to my Catholic dictionary. Nature fits into the category of "a gift freely given by God ... creation and conservation are sometimes called graces."

I hope in considering Nicollet Island, students and teachers acknowledge that they've been given a true and natural gift of grace, already, right in their own backyard.

Louise Erdrich is a writer and the owner of Birchbark Books in Minneapolis. She recently won a Minnesota Book Award for her novel "The Painted Drum."

LEARN WHAT NICOLLET ISLAND WAS, FIRST TO ITS NATIVE INHABITANTS, THE DAKOTA AND THE OJIBWE WHO SETTLED AND TRADED THERE, AND THEN TO THE BOOM TOWN OF ST. ANTHONY.

Amsterdam, June 5 - 2006

Dear sir,

From our son, he is living in Minneapolis, we heard you want to destroy a beautiful area, namely the Nicolet Island. How can you do that?

We were often there when we visited the country.

Have you seen all the different animals? Where are they going when you build a stadium at that place?

Please use your brains and stop this crazy idea, so we can enjoy next year this place again.

How can you explain this at the youth? All of us try them to have respect for all what is living in the nature and you want it to destroy!

I hope you will listen to a woman from the Netherlands, who admire your country.

Sincerely,

W.J. Janssen - Walraven.

W.J. Janssen - Walraven
Cornelis Roebolstraat 24
1067 AJ Amsterdam
The Netherlands

Cc: City Council -
Heritage Preservation Comm

163 Nicollet St.
Minneapolis MN 55401
July 28, 2006

Minneapolis Heritage Preservation Commission
210 City Hall /via e-mail

To the Commissioners:

Attached is a copy of my response letter to the EAW for the DeLaSalle project. These remarks are still relevant, and I hope you will find them of interest.

I would particularly call your attention to the visual impact of the proposed grandstand upon the Historic District, especially upon the viewscape of the 1875 Grove Street Flats. The details of the grandstand have changed somewhat since this image was prepared, but its visual bulk would actually be greater, due to the effect of the brick walls and railings that have been added on each side of the central portion.

From the location where the photo was taken, about 75 feet east of the Grove Street Flats site, the grandstand would almost entirely block the view of the trees along the river gorge and the ten-story buildings on the East Bank. Very little of that view would be visible through the central alleyway. Visually, the grandstand would be nearly as tall as an 80-foot transmission tower that stands on the far side of East Island Avenue.

The St. Anthony Falls Historic District has narrowly escaped disaster on several occasions since its founding. One of its narrowest escapes had to do with Nicollet Island.

In 1969, the Minneapolis Housing and Redevelopment Authority adopted an urban renewal plan which called for total clearance of Nicollet Island and the construction of high-rise buildings there. In 1971 the Historic District was established. In 1972, the HPC was established. Island residents and preservationists, including some HPC Commissioners and staff, called upon the MHRA to study the Island's historic buildings before taking action.

In 1973, the urban renewal plan was amended to call for preservation of the historic buildings on the Island. In 1974, a study by Miller-Dunwiddie Architects, commissioned by the MHRA, noted that the Island contained an entire neighborhood of historic buildings, dating from 1866 to 1898 and with much of their original fabric intact. Recognizing the unique nature of this resource, the MHRA did what they could to stabilize the buildings and prevent further deterioration, but their funds were limited.

In 1978, the Minneapolis Park Board and the Metropolitan Council adopted plans for the Riverfront Regional Park. The Park Board sought to acquire all of Nicollet Island, including the historic buildings. The MHRA, later restructured as the Minneapolis Community Development Agency (MCDA, and now CPED), was in the process of acquiring the historic buildings, but was unwilling to turn them over to the Park Board. The MCDA was concerned because the Park

Board had no plans for re-use of the buildings, no experience in rehabilitating buildings, and no funds for that purpose.

That disagreement was finally settled in 1985, when the MCDA sold the Park Board all of MCDA's vacant lands on the Island, at cost. MCDA also gave the Park Board, free of charge, fee title to the land under the historic houses north of the railroad. The Park Board immediately leased those properties back to the MCDA. The Grove Street Flats and adjacent parcels were being privately developed at the time, and were not part of that transaction.

The purpose of the ground lease was very simple—it was to enable the Park Board to have some control over the restoration and use of the historic houses. The Park Board knew that the MCDA planned to offer the historic houses to individual private developers, as they later did through a complex process involving a lottery. The Park Board was concerned that some of the developers might fail to restore the houses, destroy their historic character, or use them for commercial purposes, any of which would have been a detriment to the adjacent Regional Park.

It would have been possible to simply place restrictive covenants on the historic properties, and sell them to private developers on that basis. But some real-estate attorneys are of the opinion that restrictive covenants are only legally effective for 30 years. The Park Board wanted control for a longer period than that. The result was a 99-year ground lease.

The private developers' individual ground subleases from the MCDA run from 75 to 100 pages in length, and contain many restrictions and conditions relating to the historic properties. All of them include a complete copy of the Secretary of the Interior's Standards for Historic Preservation Projects. They also include a complete set of the HPC Guidelines for Nicollet Island, which are adapted from the Guidelines for the St. Anthony Falls Historic District.

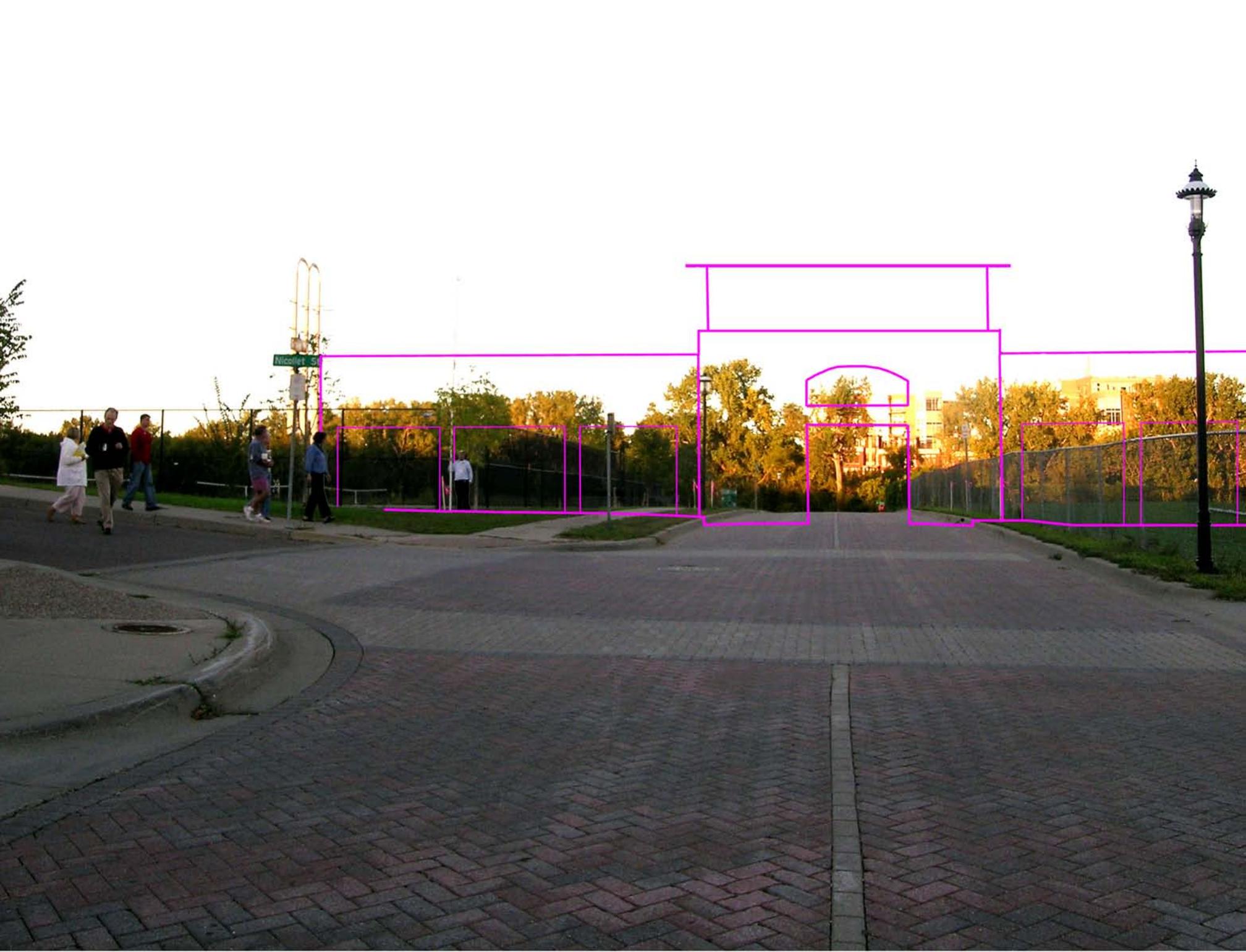
The subleases also contain an equity-sharing provision. The private sublessees are allowed an average amount of appreciation, based on the city of Minneapolis as a whole. Anything over that has to be divided with the Park Board and the MCDA. Despite sharing equity and not owning the land, the private sublessees pay property taxes exactly as though they owned the properties outright, under Minn. Stats. 273.11.

Since its founding, the Heritage Preservation Commission has played a leading role in protecting the historic character of Nicollet Island as a part of the St. Anthony Falls district. Review of the present proposal offers another opportunity to do so. The proposed stadium and grandstand are out of scale for this historic setting. The intensity of the proposed use and its related lights, amplified sound, and traffic, are not compatible with the District and will cause irremediable harm. Alternatives do exist, but they have not been investigated.

The Certificate of Appropriateness should be denied.

Thank you for your consideration,

John Chaffee



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CITY OF MINNEAPOLIS
CPED PLANNING DIVISION
HERITAGE PRESERVATION COMMISSION STAFF REPORT
Certificate of Appropriateness for the DeLaSalle Athletic Facility Project located at 25 West Island Avenue and 201
Island Avenue East

**Description of the information and method of access to the DeLaSalle High School
Athletic Field application binder for the
Minneapolis Heritage Preservation Commission**

Tab 1, Application for Certificate of Appropriateness: Available on the Planning Division's (HPC) web site (<http://www.ci.minneapolis.mn.us/hpc/index.asp>) and by request of the Planning Division project contact person: J. Michael Orange (voice: 612-673-2347; facsimile: 673-2728; TDD: 673-2157; e-mail: michael.orange@ci.minneapolis.mn.us).

Tab 2, Minneapolis Park and Recreation Board Community Advisory Committee: All items under Tab 2 can be found on the Planning Division's (Environmental Review) web site (<http://www.ci.minneapolis.mn.us/planning/delasalle.asp#TopOfPage>) and by request of the Planning Division project contact person: J. Michael Orange

- Preliminary Site Plan Presentation to the Community Advisory Committee, 9/13/05
- Preliminary Site Plan Presentation to the Community Advisory Committee, 9/29/05
- Reciprocal Use Agreement and attachments

Tab 3, Community Planning and Economic Development Environmental Assessment: All items under Tab 3 can be found on the Planning Division's (Environmental Review) web site (<http://www.ci.minneapolis.mn.us/planning/delasalle.asp#TopOfPage>) and by request of the Planning Division project contact person: J. Michael Orange

- Environmental Assessment Worksheet (EAW) for the DeLaSalle Athletic Field and its "Findings of Fact and Record of Decision" (EAW Findings) Document.
- Draft Travel Demand Management Plan
- Literature Search for Archeological Potential, DeLaSalle High School Athletic Field, Nicollet Island, Hennepin County, Minnesota
- Historic Resources Survey, DeLaSalle High School Athletic Field, Nicollet Island, Hennepin County, Minnesota

Tab 4, Athletic Facilities, Engineering and Design, Studies and Planning: All items under Tab 4 are available on the Planning Division's (HPC) web site (<http://www.ci.minneapolis.mn.us/hpc/index.asp>) and by request of the Planning Division project contact person: J. Michael Orange

Tab 5: Contact data, Graphic Images, Supplemental Information: Under this tab are photos of the area and graphic images that are already available in the above-listed sources.