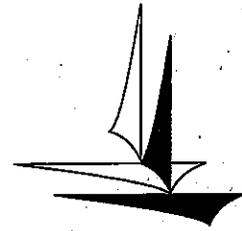


**Community Planning & Economic Development
Planning Division**
250 4th Street South, Room 300 PSC
Minneapolis, MN 55415



City of Minneapolis
*Department of Community Planning
& Economic Development - CPED*

MEMORANDUM

TO: Heritage Preservation Commission
FROM: Beth Elliott, 612.673.2442
DATE: February 28, 2012
RE: National Register of Historic Places Nomination – Lincoln Bank Building

Background

On January 19, 2012 the Minnesota Deputy State Historic Preservation Officer (SHPO) sent the Minneapolis Heritage Preservation Commission a letter requesting comments on the nomination of the Lincoln Bank Building to the National Register of Historic Places (Attachment A). The property is located at 730 Hennepin Avenue on the northwest corner of 8th Street and Hennepin Avenue.

As a Certified Local government, the Commission is required by federal law to participate in the National Register nomination process as follows:

- Afford the public a reasonable opportunity to comment on the nomination;
- Prepare a report as to whether or not the subject property is eligible for National Register listing; and
- Have the chief local elected official (the Mayor) submit this report and his/her recommendation to the Minnesota State Historic Preservation Officer within sixty days of notice from the SHPO.¹

The Owner has retained Hess, Roise and Company to nominate the subject property to the National Register of Historic Places as the first step in seeking financial aid for a substantial rehabilitation of this property. The Owner seeks state historic preservation tax credits and federal historic preservation tax credits to accomplish this goal which will require:

- The property to be listed on the National Register of Historic Places;
- The work to consist of a substantial rehabilitation (an amount greater than the pre-rehabilitation cost of the building(s));

¹ More than a simple comment letter, this report provides the City with significant decision making power in the matter. If both the Commission and the chief local elected official recommend that the subject property should not be nominated to the National Register, the SHPO shall take no further action, unless within thirty days of the receipt of such recommendation by the SHPO an appeal is filed with the State. If such an appeal is filed, the State shall follow the procedures for making nomination pursuant to established procedures. Even then, the City's report and recommendations are included with the nomination submitted by the State to the Keeper of the National Register.

- The work meet the *Secretary of the Interior's Standards for Rehabilitation*; and
- The property's historic character be maintained for five years.

Attachment A includes a copy of the nomination, prepared by Hess Roise, for your review and comment.

Previous Reviews

In 2011, the Lincoln Bank Building was surveyed as part of the Section 106 review for the Southwest Transitway Project. In a letter from MnDOT to SHPO dated April 20, 2011, the Lincoln Bank was identified as not meeting the NRHP eligibility criteria because "it appears the activities associated with 730 Hennepin were more characteristic than particularly significant in this aspect of the banking industry." A response dated June 3rd from SHPO agreed with this determination.

Less than a month later the SHPO sent a letter to the Minnesota Housing Finance Agency related to another Section 106 Review for rehabilitation of the subject building. The letter requested further in-depth review of the property by the National Park Service and "completion of our Section 106 review for this project must await the outcome of the National Park Service eligibility determination." All noted correspondence is included in Attachment B.

Nomination Review

To be eligible for listing on the National Register of Historic Places, a property must be significant within a given context and retain its integrity, defined as its ability to communicate that significance.

Significance

Hess Roise has identified that the Lincoln Bank Building meets National Register Criteria A, the property is associated with events that have made a significant contribution to the broad patterns of our history. The areas of significance identified are Commerce/Trade for both a financial institution and business.

The Lincoln Bank was established by Harry E. Pence in 1917 in an existing building at 809 Hennepin Avenue and a couple of years later it was moved into a new building at 730 Hennepin Avenue. The Lincoln Bank building's period of significance begins with the buildings opening in 1921 and ends with its transformation into the Lincoln branch of Northwestern National Bank the following year.

There are two elements of the Lincoln Bank building mentioned in the nomination material as significant to its history in banking:

1. Its connection to the local automotive industry
2. The location of the bank on Hennepin Avenue

Connection to automotive industry

Harry Pence was one of the Upper Midwest's pioneering automobile dealers and promoters in the early twentieth century. He entered the automobile trade in 1903 by opening one of the

city's first automobile dealerships in a one-story building on 3rd Street South between 3rd and 4th Avenues in Downtown Minneapolis. Two years later he partnered with General Motors to become a local Buick distributor and became influential in opening the market in rural areas of Minnesota, the Dakotas, and Montana to car ownership. His substantial Buick sales soon dubbed Pence "The House of Pence" in the automotive business because he owned the largest dealership in the West.

Financing was particularly important to the growing automotive industry for both dealers and car buyers. Even though buying on credit was seen as unsavory generally in the United States at the time, it was becoming more popular by the masses in order to own cars. The first large-scale effort in the United States to offer credit in purchasing automobiles occurred in Ohio in 1915 with the Guaranty Securities Company. The trend arrived in Minneapolis over the next few years and in many cases through branches of national banks. The Metropolitan Bank Building, for example, housed the Minneapolis office of the National Bond and Investment Company of Chicago and advertised "the car of your choice on convenient terms of payment."

According to the nomination,

"Pence, however, with his insider's knowledge of the automobile business, recognized the long-term potential of the demand and founded Lincoln National Bank to serve it. He based the bank on Hennepin Avenue, the regional main street for automobile sales and services."

According to an article in the *Minneapolis Tribune* dated May 6, 1918, the bank was established "for the purpose of providing Hennepin Avenue with banking facilities that might properly care for the automobile trade which promised to develop very rapidly along the thoroughfare."

The nomination attributes an obvious connection between Pence's auto sales business and the Lincoln Bank. The Tribune article provides evidence of the intent of the bank. There is no advertising evidence however, as there is for the National Bond and Investment Company which is cited in the nomination. Additionally, the nomination does not identify how many other Minneapolis banks were catering to the automotive industry. Without this research, it is challenging to make the case that Lincoln Bank was employing a unique business model at that time.

Location on Hennepin Avenue

The nomination makes the argument that locating a bank on Hennepin Avenue was revolutionary considering Minneapolis' financial district was a few blocks northeast. At the time Pence was constructing the building for Lincoln Bank, he already owned a building across 8th Street at 800 Hennepin Avenue that was built in 1909 to house his extensive Buick distribution company. Just a few blocks south was already the foremost location in Minneapolis to buy a car. What is now the Harmon Place Historic District contains twenty-two contributing properties along Hennepin Avenue and Harmon Place that were auto-related. The period of significance for the District is 1907-1930 with construction waning at the end due to the 1929 stock market crash.

Starting in 1905 with the opening of the Auto Construction Company at 1401 Hennepin and the Barclay Auto Company's new building on Harmon Place, Hennepin and Harmon Avenues gradually became Automobile Row, the center of the city's automotive district. By the time Pence was building the Lincoln Bank Building and running his auto distribution center across the street, over one-hundred car dealers, wholesalers, and repair garages were concentrated along Hennepin Avenue and Harmon Place.² The new Lincoln Bank was outside of Downtown's financial district on Marquette Avenue but in direct proximity to its targeted market of auto dealers and buyers. Only one other bank was located along the corridor at 1313 Hennepin and like Lincoln, it had a board of directors with ties to the nearby automobile industry. This establishment only did business from 1918 to 1924 and did not indicate in advertisements a direct interest in providing credit for the automobile trade.

While the Hess Roise research includes a couple of sources to make the case for the significance of the location of Lincoln Bank on Hennepin Avenue, the connection to the activities in the Harmon District and Pence's own building across the street put a finer point on the research. The nomination report could benefit from researching and building up this link.

Integrity

The National Register of Historic Places divides integrity into seven aspects: location, design, setting, materials, workmanship, feeling, and association. Possessing several, and usually most of these aspects allows resources to successfully communicate their historical significance within a given context.³

The Nomination provides a thorough analysis of the property's features and resources and identifies the alterations that have occurred to the property since the period of significance.

During the period of significance, the original bank occupied the ground floor and basement and the upper seven stories contained leased office space. The existing floor plans date from 1982 or later and include carpet over the original terrazzo floors and acoustic tiles covering plaster ceilings. These non-historic treatments will be removed as part of the rehabilitation. The basement still contains the massive vault doors and the vault has been converted into a meeting room. The vault doors can now be seen through an opening cut into the main level's floor from a previous remodeling project.

The primary facades on Hennepin Avenue and 8th Street still retain their original integrity. Both facades continue to be finished with the same white brick material and the window openings are intact but with modern windows. The first floor storefront and cladding materials are not original even though they still have the large window openings that let light flood into the original bank hall.

² Landscape Research, *Harmon Historic District Designation* (Minneapolis Heritage Preservation Commission, 2001) 6.

³ National Park Service, *How to Apply the National Register Criteria for Evaluation* (Washington: U.S. Government Printing Office, 1998) 44-49.

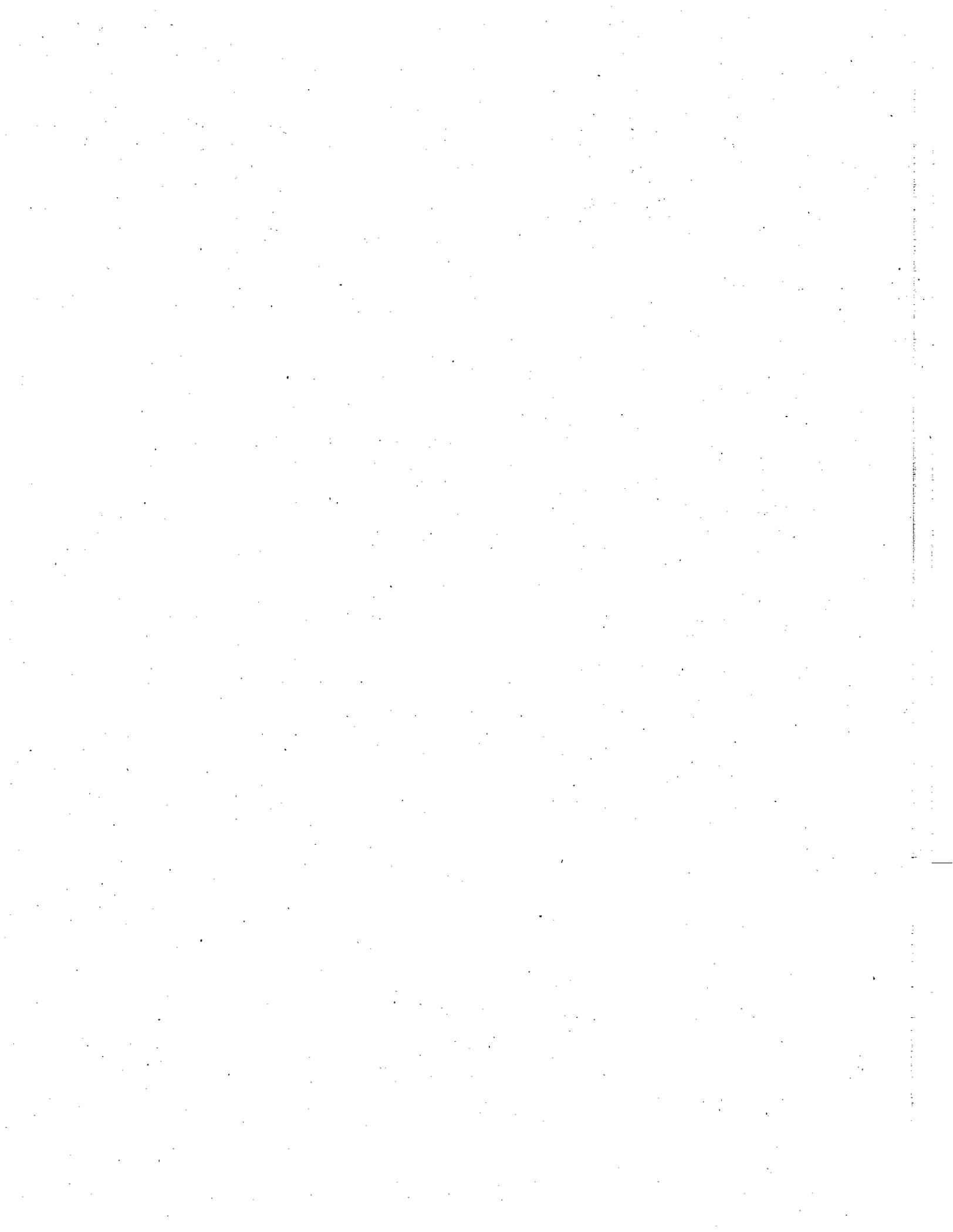
Hennepin Avenue has an overall historic character that would be diminished without the Lincoln Bank Building. This setting begins on the southern end of Downtown with the Harmon Place Historic District, jumps over contemporary buildings and parking lots to the historic theaters north of 10th Street, carries through the Pence and Lincoln Bank buildings on the corner of 8th Street to more contemporary structures, and arrives at the periphery of the Warehouse Historic District. Each of these blocks of structures has its own architectural style but the corridor overall shows a rich story of the evolution of Hennepin Avenue. While the styles are different, what has stayed consistent is the intermingling of commerce with entertainment and the variety of people patronizing the corridor.

Staff Recommendation:

The Nominator has prepared a nomination that indicates their consideration of the subject property's contributions to the history of commerce and trade in Minneapolis. CPED recommends that further analysis be completed by the Nominator regarding the automobile loan industry in Minneapolis between 1915 and 1922 and the connection of the location of the Lincoln Bank relative to the information provided in the designation of the Harmon Place Historic District. Staff recommends the Commission adopt this CPED report, approve the nomination contingent on inclusion of additional research as identified above, and direct staff to transmit the report and a letter summarizing the report to the State Historic Preservation Officer.

Attachments

- A. Lincoln Bank Building National Register of Historic Places Nomination prepared by Hess Roise
- B. 2011 Section 106 correspondence





January 19, 2012

Mr. Chad Larsen, Chair
Minneapolis Heritage Preservation Commission
250 So. 4th Street
Room 110
Minneapolis, Minnesota 55415

Re: Certified Local Government Comment on the nomination of: **Lincoln Bank Building, 730 Hennepin Avenue, Minneapolis, Hennepin County**, to the National Register of Historic Places

Dear Mr. Larsen:

The above referenced property may be considered by the State Review Board for nomination to the National Register of Historic Places on March 27, 2012. Because the City of Minneapolis has been granted Certified Local Government (CLG) Status under the provisions of 36 CFR 61.5 and the Minnesota State Historic Preservation Office's "Procedures for Applying For and Maintaining Certified Local Government Status," the nomination (copy enclosed) is being sent to the Office of the Mayor and to the Heritage Preservation Commission for review at this time.

This nomination is classified as a historical nomination. After allowing a reasonable opportunity for public comment, the Commission may prepare a report indicating its opinion as to whether the property meets the National Register Criteria (copy enclosed). At least one Commission member who meets the Federal Standards for History (see Appendix A of the state CLG procedures) should participate in formulating that opinion.

If the Heritage Preservation Commission does not include a member who meets the Federal Standards, the city may choose not to comment on this nomination through the CLG review process (in which case please advise the Preservation Office of that choice), or the Heritage Preservation Commission may obtain the opinion of a qualified professional in the subject area and consider the opinion in its recommendations. The comment must include both the credentials and opinion of the consulted professional. If the city chooses not to comment under the CLG process outlined above, comments on a nomination may be submitted to the Preservation Office in as much as any interested party may submit comments.

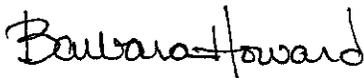
The Mayor may transmit the report of the Heritage Preservation Commission together with his comments on the eligibility of the property to Barbara Mitchell Howard, Deputy State Historic Preservation Officer, at 345 Kellogg Blvd. W., St. Paul, MN 55102. This response must be received before the close of business on March 23, 2012. Pursuant to the National Historic Preservation Act, if

both the Heritage Preservation Commission and the Mayor determine that the property does not meet the criteria, the nomination will not be further considered unless an appeal is filed with the state office.

We should note that the standard notification of State Review Board consideration of this property has been sent to the owner. Appropriate officials will be notified approximately one month before the scheduled meeting.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Barbara Mitchell Howard
Deputy State Historic Preservation Officer

enc.: National Register Program
National Register Criteria
Copy of National Register Nomination

cc: 100 East 22nd Associates, LLC
c/o Eriksson Commercial Real Estate
2305 Totem Trail
Minnetonka, MN 55305

THE NATIONAL REGISTER OF HISTORIC PLACES PROGRAM

The National Register of Historic Places is the official list of historic properties recognized by the Federal Government as worthy of preservation for their significance in American history, architecture, archaeology, engineering and culture. The National Register was created in 1966 and is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our significant historic places under the provisions of the National Historic Preservation Act. The National Park Service provides oversight for the program under the Secretary of the Interior. The program is managed by the professional staff of the National Register in Washington, DC, State Historic Preservation Officers, and the Preservation Officers in Federal Agencies. Contact the State Historic Preservation Office for a brochure describing the National Register program. For online information go to:

http://www.nps.gov/history/nr/national_register_fundamentals.htm
<http://www.nps.gov/history/nr>
<http://www.mnhs.org/shpo>
<http://nrhp.mnhs.org/>

For further information, refer to, 36 CFR (Code of Federal Regulations) 60. For online information go to:
<http://www.nps.gov/history/nr/regulations.htm>

LISTING IN THE NATIONAL REGISTER PROVIDES BENEFITS TO HISTORIC PROPERTIES:

Eligibility for Federal Tax Provisions: Since 1976, the Federal Internal Revenue Code has contained a variety of incentives to encourage capital investment in historic buildings and to spur revitalization of historic properties. These incentives include a 20% investment tax credit to encourage the preservation of historic commercial, industrial, and rental residential buildings listed on the National Register by allowing favorable tax treatments for rehabilitation. Owners of National Register properties who choose to participate in the preservation tax incentive program must follow the Secretary of the Interior's Standards for Rehabilitation and receive approval by the National Park Service of the rehabilitation project in order to receive the tax credit.

A 10% rehabilitation tax credit applies only to non-historic, non-residential buildings built before 1936. The 10% credit and the 20% credit are mutually exclusive. Buildings listed on the National Register are eligible only for the 20% tax credit. Owners of non-historic buildings in historic districts may claim a 10% credit only if they file a Part 1 Historic Preservation Certification Application with the National Park Service and receive a determination that the building does not contribute to the district and is not a certified historic structure. Contact the State Historic Preservation Office for a brochure describing the Preservation Tax Incentives. For online information go to:

<http://www.nps.gov/history/hps/tps/tax>
<http://www.nps.gov/history/hps/tps/tax/IRS.htm>
<http://www.nps.gov/history/hps/tps/tax/incentives>

For further information on building certification requirements, refer to 36 CFR (Code of Federal Regulations) 67. For online information go to: <http://www.nps.gov/history/hps/tps/tax/IRS.htm>

Eligibility for State Tax Provisions: The Minnesota Rehab Tax Credit was signed into law in April 2010. The state rehab tax credit mirrors the 20% federal historic preservation tax credit and must be used in conjunction with the federal credit. Property owners who are undertaking a historic rehabilitation project are eligible to receive a state income tax credit up to 20% of qualifying rehabilitation expenses. Owner may elect to receive a grant in lieu of a credit equal to 90% of the allowable credit. For online information go to: <http://www.mnhs.org/shpo/grants/MNHistoricStructureRehabilitationStateTaxCredit.htm>

Easement Donations: The Federal Internal Revenue Code also provides for Federal income, estate, and gift tax deductions for charitable contributions or partial interests in real property (land and buildings). Taxpayers' gifts of qualified interest may be "exclusively for conservation purposes." For online information go to:
<http://www.nps.gov/history/hps/tps/tax>

Because tax aspects outlined above are complex, individuals should consult legal counsel or the appropriate Internal Revenue Service office for assistance in determining the tax consequences of the above provisions. Colleen Gallagher is the IRS representative who serves taxpayers in Minnesota. She can be contacted at 651/726-1480 or at colleen.k.gallagher@irs.gov

Consideration in planning for Federal, federally licensed, and federally assisted projects: Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their actions on historic properties listed on or determined eligible for the National Register. Regulations of the Advisory Council on Historic

Preservation, an independent Federal agency, guide this consultation process, which is intended to assure that the value of the historic property is considered in project planning. For online information go to: <http://www.achp.gov>

For further information on the Advisory Council, refer to 36 CFR (Code of Federal Regulations) Part 800. For online information go to: <http://www.achp.gov/regs-rev04.pdf>

Qualification for Federal grants for historic preservation: Presently, funding levels are inadequate for these grants to be available.

Consideration in planning for State, state licensed, and state assisted projects: Minnesota Statutes Chapter 138 requires that state departments and agencies have the responsibility to protect the physical features and historical character of properties listed in the National Register by consulting with the Minnesota Historical Society before carrying out any undertaking, or funding, or licensing an undertaking by other parties to determine appropriate treatments and to seek ways to avoid and mitigate any adverse effects on listed properties. For further information, refer to Minnesota Statutes Chapter 138.665 and 138.666. The statutes are online at:

<http://www.revisor.leg.state.mn.us/statutes/?id=138.665>

<http://www.revisor.leg.state.mn.us/statutes/?id=138.666>

Consideration before demolition: The rules of the Minnesota Environmental Quality Board (EQB) require preparation of an Environmental Assessment Worksheet (EAW) by the responsible unit of government for any proposed demolition of a property listed in the National Register. For further information on the Environmental Quality Board refer to Minnesota Rules Parts 4410.0200, 4410.1000 and 4410.4300 subpart 31 or call 651/201-2477. For online information go to:

<https://www.revisor.mn.gov/rules/?id=4410>

<https://www.revisor.mn.gov/rules/?id=4410.4300>

ADDITIONAL INFORMATION ABOUT THE NATIONAL REGISTER PROCESS AND THE MEANING OF LISTING:

Listing on the National Register does not mean that the Federal Government wants to acquire the property, place restrictive covenants on the land, or dictate the color or materials used on individual buildings. State and local ordinances, local historical commissions, or laws establishing restrictive zoning, special design review committees, or review of exterior alterations, are not a part of the National Register.

Historic properties of national, state, or local significance under private or local/state government ownership may be nominated by the State Historic Preservation Office. Property owners, historical consultants and Preservation Office staff may prepare nominations. The Federal agency's Federal Preservation Officer nominates properties under Federal ownership to the National Register. For online information go to:

<http://www.achp.gov/fpoagencyinfo.html>

Tribal Historic Preservation Offices (THPO) perform the same type of preservation activities as those performed by State Historic Preservation Offices. These activities, however, are associated with historic properties located on Tribal Lands. Contact the State Historic Preservation Office for a list of Tribal Historic Preservation Offices in Minnesota. For online information go to:

<http://www.achp.gov/thpo.html>

Procedures have been developed to certify local governments (CLG). The mayor and the heritage preservation commission as the CLG may comment on a property being nominated in their city. If both the mayor and the heritage preservation commission determine that the property does not meet National Register criteria, the nomination will not be considered unless an appeal is filed with the Preservation Office. For a list of certified local governments, contact the Preservation Office.

Minnesota Historical Society
State Historic Preservation Office
345 Kellogg Blvd West
St. Paul, Minnesota 55102
651-259-3450
Fax: 651-282-2374
mnshpo@mnhs.org
<http://www.mnhs.org/shpo>

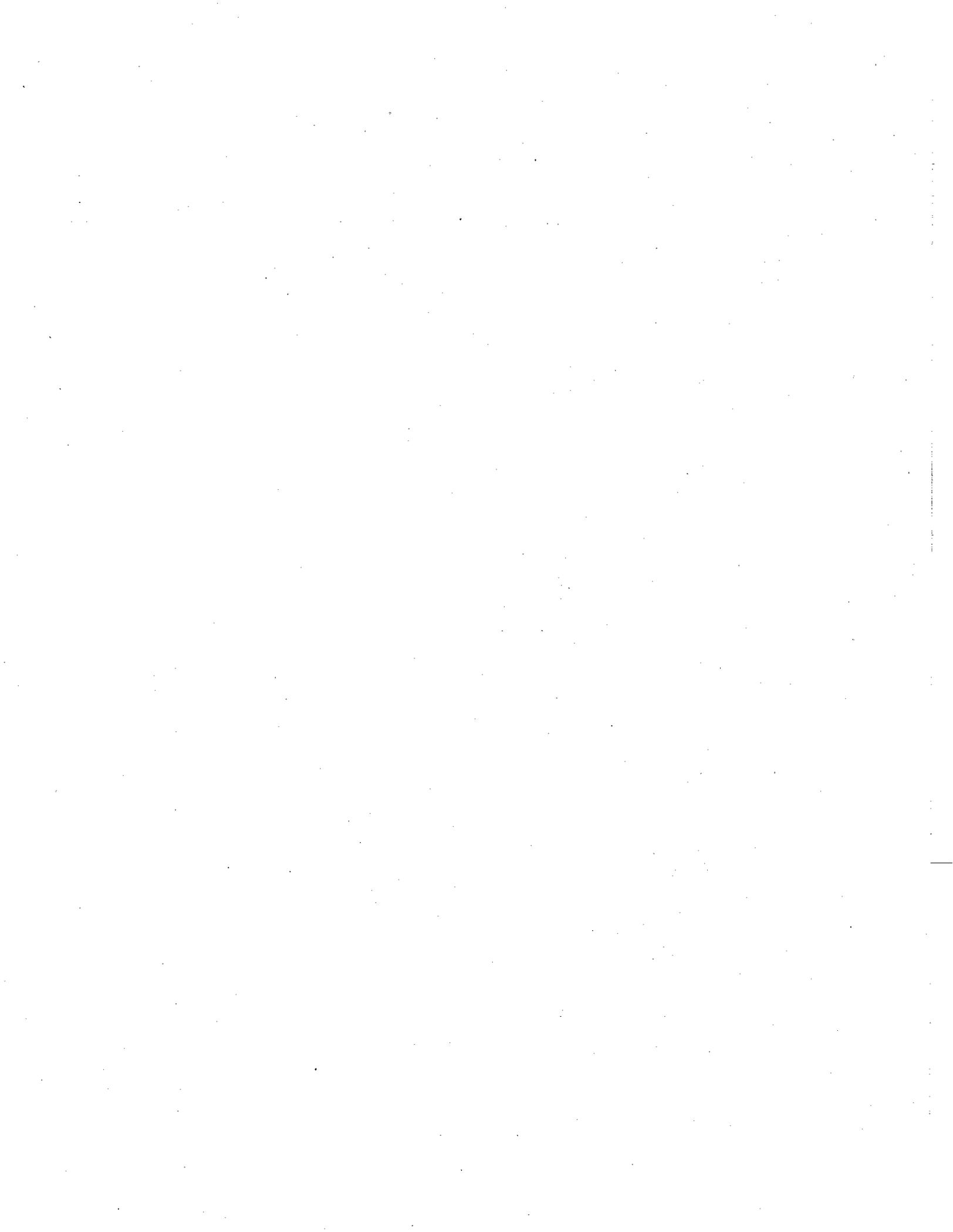
NATIONAL REGISTER CRITERIA FOR EVALUATION

The quality of significance in American history, architecture, archaeology, 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. Ordinarily 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 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 their productive life; or
- (d) a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- (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.



United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional certification comments, entries, and narrative items on continuation sheets if needed (NPS Form 10-900a).

1. Name of Property

historic name Lincoln Bank Building

other names/site number _____

2. Location

street & number 730 Hennepin Avenue

N/A	not for publication
N/A	vicinity

city or town Minneapolis

state Minnesota code MN county Hennepin code 053 zip code 55403

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,
I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:
___ national ___ statewide ___ local

Signature of certifying official/Title Date

State or Federal agency/bureau or Tribal Government

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

Signature of commenting official Date

Title State or Federal agency/bureau or Tribal Government

4. National Park Service Certification

I hereby certify that this property is:

___ entered in the National Register ___ determined eligible for the National Register

___ determined not eligible for the National Register ___ removed from the National Register

___ other (explain:) _____

Signature of the Keeper Date of Action

Lincoln Bank Building
 Name of Property

Hennepin Co., Minnesota
 County and State

5. Classification

Ownership of Property
 (Check as many boxes as apply.)

- private
- public - Local
- public - State
- public - Federal

Category of Property
 (Check only **one** box.)

- building(s)
- district
- site
- structure
- object

Number of Resources within Property
 (Do not include previously listed resources in the count.)

Contributing	Noncontributing	
1		buildings
		sites
		structures
		objects
1		Total

Name of related multiple property listing
 (Enter "N/A" if property is not part of a multiple property listing)

N/A

Number of contributing resources previously listed in the National Register

N/A

6. Function or Use

Historic Functions
 (Enter categories from instructions.)

COMMERCE/TRADE/financial institution

COMMERCE/TRADE/business

Current Functions
 (Enter categories from instructions.)

EDUCATION/school

VACANT/NOT IN USE

7. Description

Architectural Classification
 (Enter categories from instructions.)

Materials
 (Enter categories from instructions.)

foundation: CONCRETE

walls: BRICK, TERRA COTTA, STONE/Granite

roof: ASPHALT

other: _____

Lincoln Bank Building
Name of Property

Hennepin Co., Minnesota
County and State

Narrative Description

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

Summary Paragraph

The Lincoln Bank Building is an eight-story, flat-roofed building located on the north corner of the intersection of Hennepin Avenue and North Eighth Street. Because the downtown Minneapolis street grid is on a northwest-southeast axis, the building is not oriented to cardinal directions. To simplify the following description, the northeast side is assumed to be the north side, the southeast side is the east side, and so on. Hennepin Avenue, one of the major streets in Minneapolis, is to the east and North Eighth Street is to the south. A surface parking lot is immediately west and north of the building. The building occupies the entire property parcel. The primary facades overlooking Hennepin Avenue and Eighth Street are finished with glazed brick and terra-cotta, while the secondary north and west walls are common brick. The basement and first floor of the building were used for banking vaults, offices, and a hall. The upper seven stories were rented as office space. Historic finishes are extant on all of the floors and reflect the building's original use as a bank and office building.

Narrative Description

The front of the building faces Hennepin, which is to the east. Another primary facade extends along Eighth Street to the south (Photograph 1). Both facades are dominated by large window bays. Most of the bays hold groups of four modern, plate-glass windows with solid spandrel sections. The Hennepin facade is two-and-a-half bays wide; the Eighth Street facade is six bays wide. Both facades are finished in the same materials. The first story is faced in red granite panels with large aluminum-frame windows, most with modern awnings (Photograph 3). The second story is the most decorative, with cream-colored terra-cotta tiles (Photograph 3). Tile pilasters with inset panels topped with ornamental brackets sit between each window bay. These brackets support a cornice that runs along the top of the second story. Terra-cotta shields with abstracted stars and stripes are above the cornice at each pier. The third through eighth stories are faced in glazed white brick, and the projecting windowsills are cream-colored terra-cotta. A cornice-like belt course runs along the bottom of the eighth-story windows. A decorative terra-cotta cornice with corbels and dentils sits just below the roofline. The area above the cornice holds simple pilasters. The parapet wall above the cornice is also finished with glazed brick and terra-cotta, and has pilasters that line up with the facade below. Other than the first floor, the primary facades retain very good integrity. Even on the first floor, although the storefront and cladding materials have changed, the large openings that originally flooded the interior banking hall with natural light are retained.

The secondary facades overlook a parking lot that wraps around the north and west sides of the building (Photographs 2 and 4). The facades are common brick that has been painted a cream color. Most floors have multiple window openings that hold modern windows similar to those on the primary facades. A stuccoed stair tower has been added in an unobtrusive location on the west end of the north wall.

Originally, the Lincoln National Bank and the Lincoln Trust and Savings Bank shared the first floor and lower level of the building (Photographs 5 and 6). These areas were elaborately finished with ornamental plasterwork and marble walls and floors. Sections of the original plaster ceiling are above two layers of suspended acoustic-tile ceiling that were installed in successive remodeling campaigns, which severely damaged the plaster. The octagonal marble-clad columns of the former banking hall on the first floor, however, are extant, and many sections of the original marble walls are visible (Photographs 5, 6, and 7). Elevator lobbies on both floors have marble floors and walls, and decorative bronze panels edge the openings of the two elevators (Photograph 8). The elevator doors and floor indicators have been replaced by modern code-compliant models. A marble-lined stair with bronze railings runs from the lower level to the second floor by the elevator lobbies (Photographs 9, 10, and 11). On the lower level, adjacent to the elevator lobby, is a room with marble walls and floor that is dominated by massive vault doors, which were a highlight of the original bank (Figure 3, Photograph 12). The vault has been converted into a meeting room for the school that occupies the building's lower floors. The vault doors are now visible from the former banking hall because an opening was cut in the floor on the first level during a 1982 remodeling.

A less ornate stairway served the upper floors, which originally had open floor plans with plaster perimeter walls and terrazzo floors (Photograph 14). Plaster also finished the concrete ceiling structure. Office tenants built out each floor to suit their needs, and the configuration and finishes were modified repeatedly over time. The existing floor plans date from the 1982 remodeling and later. The original terrazzo floors, which have marble strips between the panels, have been

Lincoln Bank Building

Name of Property

Hennepin Co., Minnesota

County and State

covered with carpet (Figure 4, Photograph 15). Acoustic tiles were glued to the original plaster ceilings at some point. Later, suspended acoustic-tile ceilings were installed. The non-historic carpet, ceiling treatments, and partitions will be removed as part of the proposed rehabilitation and the original surfaces repaired.

While there have been some alterations to the property, its overall integrity is good. In comparing a historic photograph of the Lincoln Bank Building (Figure 1) with the same view today (Photograph 1), it is clear that the historic character of the building's exterior remains intact. While the banking hall has been altered and current decorations are distracting, the general feeling of the space's scale is discernible, and many of the original materials remain. Its integrity is far stronger than that of some comparable properties that have been listed in the National Register. There is virtually no trace of the dramatic two-story banking hall that was originally in the First National Bank-Soo Line Building in Minneapolis, for example, which was listed in 2008. (The office space of the Soo Line, the building's other original occupant, is also no longer extant.) The vault on the lower level of the Lincoln Bank Building and its massive door strongly communicate the building's original function. If necessary to improve the integrity of the building, the opening that allows this door to be seen from the first floor could be filled in as part of the rehabilitation proposed by this application. The integrity of the interior is reinforced by the elegant stairway that connects the lower, first, and second levels, and by the terrazzo and plaster finishes that characterize the historic office space on the upper floors.

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8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D Property has yielded, or is likely to yield, information important in prehistory or history.

Areas of Significance

(Enter categories from instructions.)

COMMERCE

Period of Significance

1921-1922

Significant Dates

1921-1922

Significant Person

(Complete only if Criterion B is marked above.)

Cultural Affiliation

Architect/Builder

Long, Lamoreaux, and Long

Criteria Considerations

(Mark "x" in all the boxes that apply.)

Property is:

- A Owned by a religious institution or used for religious purposes.
- B removed from its original location.
- C a birthplace or grave.
- D a cemetery.
- E a reconstructed building, object, or structure.
- F a commemorative property.
- G less than 50 years old or achieving significance within the past 50 years.

Period of Significance (justification)

The property's period of significance begins with the building's opening in 1921—a physical sign of Lincoln's success in establishing a new model for banking in Minneapolis. This was quickly acknowledged by Northwestern National, which acquired Lincoln in the following year, ending the period of significance. At that point, although retaining autonomy to a certain extent, Lincoln was no longer an innovative upstart but instead part of a large, well-established corporation.

Criteria Considerations (explanation, if necessary)

N/A

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Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance and applicable criteria.)

The Lincoln Bank Building is locally significant under Criterion A in the area of Commerce for its association with banking. Lincoln National Bank broke with traditional banking practices in Minneapolis in the location of its facility, the types of business it targeted, and the way it reached out to customers.

The bank was established in 1917 by Harry E. Pence, one of the upper Midwest's pioneering automobile dealers and promoters. Financing was critical for the fledgling industry, both for dealers and for car buyers. Well-established banks were at first hesitant to enter this rapidly emerging market in a period of substantial change for both the automobile and the financial industries. Pence, however, with his insider's knowledge of the automobile business, recognized the long-term potential of the demand and founded Lincoln National Bank to serve it. He based the bank on Hennepin Avenue, the regional main street for automobile sales and service. While the location was logical given this focus, it was unusual for the banking industry, which was concentrated in a financial district several blocks away. The location also gave the bank an entrée to the entertainment industry—the other main activity on Hennepin Avenue—and to working-class and middle-class customers, who were less comfortable in the more formal banking halls in the financial district. Pence's faith in the location and his target markets was quickly rewarded by the bank's profitability. This was physically represented by the construction of a handsome new home for the bank with a location and design that reinforced the important association between cars, consumers, and credit. Large windows along Hennepin and Eighth Street made the banking hall welcoming to all. When regulations changed shortly after the building was completed to allow branch banks, one of the leading regional banks, Northwestern National, jumped at the chance to acquire Lincoln, giving it a beachhead in a nontraditional banking location and the young but burgeoning automobile industry.

The property's period of significance begins with the building's opening in 1921 and ends with its transformation into the Lincoln Office of Northwestern National Bank the following year.

Narrative Statement of Significance (Provide at least one paragraph for each area of significance.)

The Early Twentieth-century Context: America's Emerging Automobile Industry

Lincoln Bank's significance is related to America's early automobile industry, which went through a period of rapid development in the first decades of the twentieth century. Methods of manufacturing were radically transformed by the introduction of the assembly line and other innovations. The Model T brought the possibility of car ownership to the masses. A network of distributors and dealers became established.

By the 1920s, the industry was becoming more sophisticated. Several giant corporations—General Motors, Ford, and Chrysler—emerged as the Big Three from the ranks of hundreds of small automobile makers that were founded during the industry's youth. Government initiatives, such as the creation of a national highway system with the passage of the Federal Highway Act of 1921, underlined the increasing role that the automobile was playing in the American economy.¹

As the scale of production and distribution expanded, financial requirements grew as well. Manufacturers needed massive amounts of capital to run and update factories, and most did not extend credit to dealers, especially in the early years. Dealers were expected to pay for cars upfront. To maintain their large and expensive inventories, dealers worked with financial institutions on "wholesale" financing. As collateral, a financial institution retained title to the cars that were sitting on the showroom floor until the cars were sold. "There is no question that without the availability of wholesale financing many dealers would be hard pressed to keep their doors open for business," an industry source explained. "Therefore, wholesale financing serves a very important function in sustaining the good health of the franchised dealer system under which the automotive industry markets its products."²

For the "retail" financing—providing installment loans to car buyers—dealers had several options. One was through credit services run independently or by car manufacturers. Private credit services dedicated to automobile loans emerged in the mid-1910s, modeled after installment sales plans for other consumer goods such as sewing machines, pianos, and wagons. The first large-scale efforts to finance automobile sales were begun in Ohio in 1915 with the Guaranty Securities

¹ John B. Rae, *The American Automobile Industry* (Boston: G. K. Hall and Company, 1984), 59.

² National Automobile Dealers Association, *Merchandising Cars and Trucks* (Midland, Mich.: Northwood Institute, 1967), 181-185.

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Company. Within a year, the booming business was reorganized as a corporation with prominent automobile-industry leaders on the board of directors. Within a few years, there were similar operations in Minneapolis, sometimes branches of national organizations. By 1920, for example, the National Bond and Investment Company of Chicago had a Minneapolis office in the Metropolitan Bank Building that promised "the car of your choice on convenient terms of payment." Advertisements emphasized that "half the cars you see on the road are bought on time."³

Alfred P. Sloan, Jr., who was on Guaranty's board, became an executive at General Motors in 1915, the same year the Guaranty was founded. During this period, there was a shake-up in the leadership of General Motors, which had been headed by William Durant. Sloan and an associate, John Raskob, rose to the top and were ready to lead the company into the future when Durant was forced out in 1920. It was Raskob's idea to create the General Motors Acceptance Corporation (GMAC) in 1919 to ensure demand for production by financing automobile sales. Buyers were required to make a 25-percent down payment; the remainder was amortized over twelve months. In the program's first year, GMAC generated loans of about \$2 million. Six years later, three-quarters of all car sales involved installment loans, and a GMAC advertisement in *American Magazine* claimed that "more than 2,500 banks are cooperating with it to finance the credit sales of General Motors cars and trucks." By this time, Sloan had become president of General Motors, and his experience with the Guaranty Securities Corporation was invaluable for establishing GMAC. Other manufacturers followed this trend and soon set up their own sales finance companies.⁴

Dealers could also offer car loans through a local financial institution. "Usually, his choice will be influenced by his *wholesale* financing arrangements. . . . In recognition of the fact that wholesale financing is considerably less profitable to the financial institution than is its retail counterpart, he usually will channel as much of his retail paper as possible to his wholesale financing sources as, in a sense, additional compensation."⁵

Through whatever means it was obtained, the installment loan was the key to the explosion of car ownership in the United States. As historian Lendol Calder observed in his book on *Financing the American Dream*, "since the 1920s the most crucial element in the pursuit of the good life has been access to consumer credit." During that decade, "the volume of consumer debt soared upward 131 percent, from \$3.3 billion to \$7.6 billion."⁶

Automobiles were responsible for a sizable amount of that increase. A book published in 1930 entitled *Financing the Consumer* asserted that "the automobile was the great expansive agent for installment credit." At the same time, there was a synergistic relationship between credit and cars. "Without credit financing, the automobile would not so quickly have reached, and perhaps never have reached, a true mass market, and its impact on American life would have taken a very different course," Calder concluded. "Installment credit and the automobile were both cause and consequence of each other's success." This was particularly true for mid-range cars, such as Buick. The rich could pay cash for luxury cars, and the cost of a basic Ford dropped to a relatively affordable level as a result of mass manufacturing. It was the burgeoning middle class that became the major market for mid-range cars and the installment loans needed to acquire them.⁷

In 1921, about 1.1 million cars were being manufactured in the United States. By 1929, that number had jumped to over 5 million.⁸ To sell them, companies had to convince owners to trade in "obsolete" cars for new vehicles. In a radical departure from the one-size-fits-all philosophy behind Ford's Model T, car companies began introducing new models on an annual basis. They also created a range of models, establishing a "clear class structure," according to historian Northcoate Hamilton. "This class structure was upwardly mobile, meaning that a buyer could theoretically purchase additional stature by moving from a Chevrolet to a Pontiac and from that line to a more expensive car." This was part of the new

³ Lendol Calder, *Financing the American Dream: A Cultural History of Consumer Credit* (Princeton, N.J.: Princeton University Press, 1999), 187-193; Ed Cray, *Chrome Colossus: General Motors and Its Times* (New York: McGraw-Hill Book Company, 1980), 159; William H. Grimes, *The Story of Commercial Credit Company, 1912-1945* (Baltimore: William H. Grimes, 1946), 24-25; National Bond and Investment Company advertisement in *Minneapolis Journal*, February 1, 1920.

⁴ Calder, *Financing the American Dream*, 187-193; Cray, *Chrome Colossus*, 159; David Farber, *Sloan Rules: Alfred P. Sloan and the Triumph of General Motors* (Chicago: University of Chicago Press, 2002), 45-46, 104.

⁵ National Automobile Dealers Association, *Merchandising Cars and Trucks*, 185-186.

⁶ Calder, *Financing the American Dream*, 5, 18.

⁷ Quote from *Financing the Consumer* and Calder quote are in Calder, *Financing the American Dream*, 184. See also George S. May, "Marketing," in *The Automobile Industry, 1920-1980*, ed. George S. May (New York and Oxford: Facts on File/Bruccoli Clark Layman, 1989), 309-312.

⁸ Rae, *The American Automobile Industry*, 61.

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consumerism, enabled by the country's prosperity following World War I, which became a hallmark of American society in the twentieth century.⁹

Bankers, who were generally conservative in nature, were leery of using automobiles as collateral. During an executive council meeting of the Wisconsin Banker's Association in 1915, according to the *Oshkosh Daily Northwestern*, "C. J. Borum of Barron, discussing the phase 'Automobile Loans' of 'Country Bank Problems,' warned fellow bankers against being too liberal in making loans to be used in the purchase of automobiles." He continued, "If the automobile manufacturer expects to keep up with the present pace, he will need to follow the plan of the piano and agricultural implement manufacturers, viz, carry his dealers paper and the paper of his dealer's customer." Henry Ford and other manufacturers resisted, saying "the automobile manufacturer will not relieve the banker of the burden caused by the fact that farmers are buying automobiles on credit."¹⁰

A few banks, such as Meyer-Kiser Bank in Fort Wayne, Indiana, did establish departments specifically to handle automobile loans, but this was rare. An index of leading newspapers from across the country for the period from 1915 to 1922 contains virtually no advertisements by banks for an automobile loan department. There was likewise a dearth of advertisements for automobile loans in Minnesota papers during this same period and through at least the 1920s. This silence, at a time when cars were increasingly purchased with the help of loans, reflects a general stigma against debt that is hard to comprehend from the perspective of the twenty-first century. The stigma faded over the decades, as advertisements for car loans became commonplace. A 1967 textbook, *Merchandising Cars and Trucks*, issued by the National Automobile Dealers Association asserted that "the availability of installment financing is unquestionably the most indispensable single element in the yearly marketing" of automobiles.¹¹

Pence and Promotion

In the early twentieth century, Harry Pence was a car marketer extraordinaire. As importantly, he pioneered ways to finance cars for both dealers and buyers. In doing so, he was responsible for making it possible for thousands of people in the Upper Midwest to buy their first cars. Born in Ohio in 1867, he moved to Minneapolis around the turn of the century. After holding several jobs in river transport and real estate, he entered the automobile trade in 1903, opening an automobile dealership—one of the city's first—in a one-story building on Third Street South between Third and Fourth Avenues. He sold eighty-three cars during his first year in business, an impressive start considering that there were fewer than three thousand cars registered in Minnesota at the time.¹²

William Durant, the powerful Michigan automobile entrepreneur who was soon to found General Motors, chose Pence as a Buick distributor in 1905, just as Durant was taking control of that manufacturer. Pence was to be a distributor to between thirty and fifty dealerships in Minnesota, the Dakotas, and Montana, as well as having his own dealerships. The role of the distributor was especially influential in the upper Midwestern plains, a largely rural area that stood to benefit immensely from automotive transport of people and agricultural goods. Pence's territory expanded beyond his original four-state area to parts of Wisconsin and Wyoming. He opened warehouses and branch dealerships under his own name in Duluth, Minnesota, Fargo, North Dakota, and Huron, Mitchell, and Sioux Falls, South Dakota. The volume of sales, particularly of the Buick brand, rose substantially in 1906, and "The House of Pence" became well established in the automotive business, claiming the distinction of being the largest dealership in the West. That same year, his showroom moved to a four-story building that Pence commissioned for his growing company at 717 Hennepin Avenue.¹³

During this period, Pence was becoming a prominent promoter of the automobile in general. He was elected to the board of the newly formed Minneapolis Automobile Dealers Association in 1905. By virtue of his position on that board, he was installed as president of the Minneapolis Automobile Show Association in 1906 and put in charge of producing its first local

⁹ Northcoate Hamilton, "General Motors Corporation," in *The Automobile Industry, 1920-1980*, ed. George S. May (New York and Oxford: Facts on File/Bruccoli Clark Layman, 1989), 176-180.

¹⁰ "Go Slow on Auto Loans," *Daily Northwestern* (Oshkosh, Wisc.), July 15, 1915; "Banker Says Auto Makers Soon Will be Forced to Carry Paper of the Dealer and Customers," *Racine Journal-News*, July 15, 1915; "Barron Borum Raps Auto Loans," *Eau Claire Leader*, July 17, 1915.

¹¹ Meyer-Kiser Corporation advertisement, *Fort Wayne Journal Gazette*, April 19, 1920; "History in the Making," *Hamburg [Iowa] Reporter*, July 22, 1920; National Automobile Dealers Association, *Merchandising Cars and Trucks*, 181.

¹² "Largest Automobile House in the West!," Pence Automobile Company advertisement, *Minneapolis Journal*, February 18, 1906; "A Group of the Best the Market Affords by an Old and Reliable House," Pence Automobile Company advertisement, *Minneapolis Journal*, February 17, 1907; "Pence at Home to Visitors," *Minneapolis Journal*, February 20, 1910.

¹³ "Buick Dealers Ready," *Minneapolis Journal*, December 26, 1909; "Pence Plant Prospers," *Minneapolis Journal*, February 18, 1906; "Pence Company Covers an Extensive Territory," *Minneapolis Journal*, February 17, 1907.

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exhibition. Then, as now, automobile shows allowed curiosity seekers and prospective buyers alike to kick the tires and see how the cars worked. The shows quickly emerged as a key vehicle for advertising and promoting the new machines. Soon, they became remarkable social events with live music, art displays, and a carnival atmosphere.¹⁴

Pence was involved in business ventures outside the automotive industry as well. In the late 1910s, he cofounded the Walker-Pence Company with descendants of Thomas Barlow Walker, a wealthy lumberman, investor, and philanthropist. Specializing in real estate development, the Walker-Pence Company erected local landmarks such as the Commodore Hotel in Saint Paul and the State Theater in Minneapolis. The latter was on the southeast corner of Hennepin and Eighth Street, a site previously occupied by T. B. Walker's elaborate mansion. It was erected directly across the street from Pence's penultimate showroom and workshop, an eight-story terra-cotta-clad building at 800 Hennepin, which opened in 1909.¹⁵

A Bank Comes to Hennepin

Cars are more than necessary transportation. They provide a means for travel that is nonessential or could be done by other means. They represent status and taste. They are occasionally an investment, but more often a major expenditure that does nothing but depreciate. The sale of this complex commodity is traditionally done in a showroom—and the word "show" implies both physical display and the drama, large or small, that plays out between buyer and seller for every transaction. It was fitting that Pence chose to place his showroom on Hennepin, "The Avenue to Minneapolis that Broadway is to New York." The city's major theaters surrounded Pence's emporium, while the main automobile row was a few blocks to the south. If you wanted to buy a car in Minneapolis, this is where you had to come; the automobile retail strips on Lake Street and, later, suburban highways, did not appear until years later. Like its Eastern counterpart, Hennepin was also known for less reputable entertainments. These were somewhat ameliorated by the presence of the Minneapolis Public Library, which opened on the corner of Hennepin and Tenth Street in 1889. (Pence served on the library's board from 1913 until his death in 1933.) The proximity to the retail district along Nicollet Avenue also gave Hennepin some respectability.¹⁶

Still, it seemed a radical place to put a bank—unless you were Harry Pence. Pence's early involvement with automobile financing is hard to trace with information that survives today. Given the volume of vehicles he distributed, though, it would seem likely that he followed the practice of other early twentieth-century automobile dealers who took mortgages on people's homes to finance car purchases. Pence claimed to be surprised when he was "accused in Chicago in the last week of holding mortgages on half the homes in Minneapolis, for furnishing the owners with autos. I have had it thrown at me in the East that I had mortgages on 2,400 homes in Minneapolis, all mortgaged to buy autos." Pence denied any of this was true, but added: "I cannot state positively that people have not mortgaged their homes with the banks to buy machines from me, I know nothing positively of that however." He pointed out that consumers had started buying everything from groceries to houses on credit, adding: "This is not a lecture on financial systems, but this country would go to pieces tonight if it were not for credit."¹⁷ Whether through banks or dealers, however, the practice grew. In 1920, the *Minneapolis Tribune* article noted that "there were large amounts borrowed by mortgaging houses for the purpose of buying automobiles."¹⁸

Regardless of the veracity of the rumors and accusations, Pence soon had more overt involvement in the financial world: Lincoln National Bank of Minneapolis. He and his well-capitalized backers proposed to name the institution Second National Bank when they established it in 1917, perhaps to give it instant credibility by following in the footsteps of the old-line First National Bank, "but the Treasury department would not grant permission for the use of the name here, on the ground it is a priority title and cannot be bestowed unless the bank is actually the second bank organized." Instead, Pence

¹⁴ "Auto Dealers' Association to Incorporate," *Minneapolis Journal*, February 15, 1905; "Pence Foresees Selling Harvest," *Minneapolis Journal*, February 18, 1912; James J. Flink, *America Adopts the Automobile, 1895-1910* (Cambridge, Mass.: MIT Press, 1970), 49.

¹⁵ T. B. Walker and Family Papers, 1856-1990, available at the Minnesota Historical Society, Saint Paul; "Death Ends Colorful Career of H. E. Pence," *Minneapolis Journal*, March 30, 1933; "Lincoln Bank Formally Opens Its New Home," August 9, 1921, unattributed newspaper clipping, available in the Banks: Mpls: Lincoln National Bank Folder, Minneapolis Collection, Minneapolis Central Library; Lincoln National Bank and Lincoln Trust and Savings Bank, "At the Gateway to the Land of Plenty," published by the company, located in the Banks: Mpls: Lincoln National Bank Folder, Minneapolis Collection, Minneapolis Central Library. The Pence Automobile Company Building at 800 Hennepin was listed in the National Register in 2007 under Criterion A for its important role in the formative years of the automobile industry and under Criterion B for its association with Harry Pence. The interior was remodeled numerous times after the company moved out of the building in 1929, leaving essentially no original materials on the interior, and the large showroom windows on the first floor were replaced.

¹⁶ "The Lincoln Bank Building," *Minneapolis Journal*, August 8, 1921.

¹⁷ "Mortgages on Homes to Buy Automobiles?," *Minneapolis Tribune*, July 28, 1910.

¹⁸ Dr. Frank M. Surface, "The Automobile and Related Industries," *Minneapolis Tribune*, September 11, 1920.

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adopted the name of the sixteenth president "not only [to] honor . . . the great emancipator" but because "it carries with it his well-known characteristics of strength, ability, fidelity, firmness, faithfulness, loyalty, conservatism, etc., attributes very desirable in a national bank."¹⁹

The bank was established "for the purpose of providing Hennepin Avenue with banking facilities that might properly care for the automobile trade which promised to develop very rapidly along the thoroughfare." The automobile industry in Minneapolis was indeed growing rapidly. In 1919, sales of automotive supplies, automobiles, trucks, tractors, and accessories in Minneapolis totaled \$354 million. As the regional distributor of Buick, Pence benefitted and so did the bank, which had close ties to the Pence Company. An article in *Motor Magazine* stated, "As the automobile business increased the financial end became a big one, so Pence organized . . . Lincoln National Bank."²⁰

It was an unusual decision for a commercial bank of this period to ally itself with the young and unpredictable automobile industry. Most commercial banks preferred to serve traditional businesses in traditional industries, and nationally chartered stalwarts like Northwestern National Bank were particularly conservative in their operations. More innovative lending was the realm of finance firms like the Guaranty Securities Corporation, which were formed "to take special credit risks because of special training, equipment, and knowledge" in particular industries. Pence created a hybrid. Using his background, he brought that "special training, equipment, and knowledge" to Lincoln National Bank and positioned it as a diversified nationally chartered bank with a particular affinity for the automobile industry.²¹

Lincoln's leadership represented both that focus and the broader base of traditional banking. Pence was the chairman of the board of directors. Archie D. Walker, a son of T. B. and a partner in the Walker-Pence Company, was on the executive committee. The cashier was Charles I. Welch, a former state bank examiner, and the president was A. H. Turritin, who had served as the state superintendent of banking and treasurer of the Federal Land Bank in Saint Paul.²²

In addition to its unusual interest in the automobile industry, Lincoln also chose an unusual location, away from the financial district on Marquette Avenue a few blocks to the east. It described Hennepin as a "large and important" area of downtown "that has not had adequate banking facilities close at hand." The city's first financial district had, in fact, been on Hennepin Avenue, around Bridge Square near the first bridge across the Mississippi River. By the late nineteenth century, though, that area was declining. In 1908, Horace Hudson observed the pattern of bank movement: "Nearly all the changes of location of the last fifteen or twenty years . . . have been towards a new common center in the general vicinity of First Avenue South and Fourth Street." This pattern was only reinforced in later decades. In 1937, sociologist Calvin Schmid analyzed "the banking cluster of today on Fourth and Fifth Streets at Marquette and Second Avenue South." He concluded: "Here are all the banks to be found, with the exception of one still at Washington and Hennepin Avenues, two branches at Seventh and Eighth Streets, and one just beyond the cluster at Sixth Street."²³

Schmid noted that entertainment and retailing districts, too, left the increasing deterioration of Bridge Square: "The theaters have trouped up Hennepin just as the retail stores have bustled up Nicollet." Mixed in with the theaters were "eating houses, beer gardens, restaurants, and dancing places" (Figure 5). The retail core of Nicollet buffered the Marquette Avenue banking district from Hennepin. Hennepin's somewhat unsavory reputation made it a questionable address for a bank—unless the bank had a distinct purpose for being in proximity to a targeted market, such as the concentration of automobile-related businesses extending south of Eighth Street.²⁴

Lincoln was not the only bank on Automobile Row. In 1918, Republic State Bank opened at 1313 Hennepin Avenue. Like Lincoln, some members of Republic's board of directors had ties to the automobile industry: L. H. Fawkes of Fawkes Automobile, Peter Marschall, president of Commercial Auto Supply Company, and A. Zekman, president of Zekman Auto Company. Unlike Lincoln, though, Republic's advertisements did not indicate a direct interest in the automobile trade. The

¹⁹ "Lincoln National Is Name of New Bank," *Minneapolis Tribune*, December 15, 1917.

²⁰ "New National Bank to Open Tomorrow," *Minneapolis Tribune*, May 6, 1918; "384 Million Auto Business Here in Year," *Minneapolis Tribune*, February 1, 1920; J. Edward Smith, "Pence of the Northwest," *Motor Magazine* (June 1925): 84.

²¹ Grimes, *Story of Commercial Credit Company*, 3.

²² "Northwestern National, Minneapolis, Absorbs Lincoln National and South Side State Banks," *Commercial West* 42 (August 5, 1922): 11; "Turritin Leaves Bank to Be First Aide of Governor," *Minneapolis Tribune*, January 7, 1921.

²³ "New Bank to Open Soon in Automobile District," *Minneapolis Tribune*, January 14, 1918; "Lincoln National New Bank, to Open Its Doors Tuesday," *Minneapolis Journal*, May 6, 1918; Calvin Schmid, *Social Saga of Two Cities: An Ecological and Statistical Study of Social Trends in Minneapolis and St. Paul* (Minneapolis: Minneapolis Council of Social Agencies, 1937), 47-48. Hudson quote is in Schmid.

²⁴ Schmid, *Social Saga of Two Cities*, 48-49.

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bank did not attract much business, and it closed in 1924 after its deposits had dropped to \$15,029. As Schmid indicated, while a few other banks braved the untraditional surroundings west of Nicollet, the overwhelming majority did not follow the path blazed by Lincoln.²⁵

When Lincoln National Bank opened for business on May 7, 1918, it occupied an existing property, "the former Long, Lamoreaux and Long Building" at 809 Hennepin. The building was completely renovated for the new use: "The large pillars in front will be removed and the building will be so changed as to make it one of the most attractive banking homes of the city."²⁶

While most Minnesota banks were chartered by the state, Lincoln National Bank joined the more exclusive cadre of only half a dozen national banks in Minneapolis. Lincoln was capitalized at \$250,000 with a surplus of \$50,000. It almost immediately had deposits of \$456,338 and a loan portfolio of \$1,172. In October, an advertisement in the *Minneapolis Tribune* for the "rapidly growing bank in a rapidly growing part of Minneapolis" claimed "resources over one million dollars."²⁷

The bank's mission was "to take care of the automobile business and, in general, to serve downtown Hennepin Avenue business interests." The bank advertised that it "will do a general banking business, and Checking Accounts and Savings Deposits are solicited." Advertisements in 1919 urged people "to take advantage of the profitable and sound investments that are sure to come . . . by opening a savings account with us and adding to it regularly." A "first birthday" advertisement in June provided milestones in the growth of the bank's deposits, which had jumped to \$1.4 million by April. In the following year, Lincoln was offering an array of investments, including bonds promising a 6 percent return and backed by mortgages "selected by Minneapolis men, secured on Minneapolis property, sold by a Minneapolis bank." In June, the bank advertised the opportunity to invest in a \$50,000 issue of first mortgage serial bonds for the W. B. Foshay Company.²⁸

At the same time, the bank's relationship with the automobile industry continued. The bank's 1921 annual report listed loans to automobile dealers, tire companies, an automobile paint company, and other automobile-related businesses. The bank also made its largest individual loan of \$150,000 to the Pence Holding Company—which owned and operated the building. With Pence's close association with Lincoln National Bank, this may have been the source of buyer credit at his dealership or the "wholesale" financing of his automobile inventory. Given the stigma related to loans and the associated lack of advertising, methods of financing car purchases are not documented. In any event, the bank did marketing to consumers in settings associated with cars. It had a booth, for example, at the 1922 automobile show, the event of the year for prospective car buyers.²⁹

Pence's automobile business appears to have thrived, even in the early 1920s when an overall industry slump was precipitated by a change in the Federal Reserve's credit policy. In May 1921, the *Associated Automotive Journal* observed: "While generally speaking there is only a slight lifting of the sales cloud situation, one optimistic note is struck in the receipt by the Pence Automobiles Co., which buys Buicks for a large territory and distributes on its own account, of a train of cars, the first time this train has moved its wheels in four months. The Pence company owns two trains and this one was composed of 76 cars, four automobiles to a car, which cost the firm just \$411,139.20." The new stock arrived just in time: "The company had just 30 cars left in the house." Pence felt that a national increase in savings bank deposits proved "that the people have the money to buy automobiles."³⁰

Lincoln's Business Accelerates

In the meantime, Lincoln National Bank was experiencing exceptional growth. In December 1919, the board announced plans to increase the bank's capitalization to \$500,000 and create an affiliate, Lincoln Trust and Savings Bank. Pence was

²⁵ "New Bank to Open Soon in Automobile District"; "Republic State Bank" (advertisement), *Minneapolis Tribune*, February 22, 1918; "Lincoln National New Bank, to Open Its Doors Tuesday"; Charles Popple, *Development of Two Bank Groups of the Central Northwest* (Cambridge, Mass.: Harvard University Press, 1944), 108.

²⁶ "Lincoln National Is Name of New Bank." This building is no longer extant; the State Theater now occupies the site.

²⁷ "New National Bank to Open Tomorrow"; "Ten Million Dollars Gain of City's Banks in Year Just Ended," *Minneapolis Tribune*, May 15, 1918; advertisements for Lincoln National Bank in the *Minneapolis Tribune*, October 20, 1918.

²⁸ "Advertisements for Lincoln National Bank in the *Minneapolis Journal*, May 6, 1918, and the *Minneapolis Tribune*, January 1 and June 17, 1919, and April 11 and June 9, 1920.

²⁹ Lincoln National Bank, "Annual Report for 1921," located in the folder Records of Member Banks, Norwest Bancorporation Collection, available at the Minnesota Historical Society, Saint Paul; "The Lincoln Bank Building"; "Start Is Made on 1922 Trade Week Program," *Minneapolis Tribune*, February 12, 1922.

³⁰ "Minneapolis Finds Sales Cloud Lifting," *Associated Automotive Journal*, May 1921.

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a vice president, Archie Walker was chairman of the board, and Turritin was a director. With the growth of the original bank and the establishment of the affiliate, a new headquarters was needed to accommodate the larger operations. In 1919, Pence announced plans for a more fitting facility at 730 Hennepin, directly across Eighth Street from his showroom. Long, Lamoreaux, and Long, which had designed Pence's showroom, were the architects, and they gave the new bank similar showroom windows. Completion of construction took more than a year longer than expected because of labor troubles and delays in receiving building materials, forcing the Lincoln Trust and Savings Bank to set up temporary offices on the first floor of Pence's automobile building for several months. In the end, the construction cost for the new structure was about \$1 million.³¹

When the eight-story building officially opened on August 9, 1921, it housed both banks. A local newspaper called it a "monument to its builders' faith in the city" and noted that "it is the largest building of its kind completed since the war." Located "in the heart of the rapidly developing retail district of upper Hennepin, the Lincoln occupies a commanding position, which is certain to combine with its new and modern equipment in the upbuilding of a mighty financial institution." The main banking room, acclaimed as "one of the most elaborate in the city," was "flooded with light from the row of south windows." The "walls and wainscot are of Tavernelle marble, imported from France, of various delicate cream and pink tints. . . . The floor of the lobby is constructed of Tennessee marble of a warm, slightly rosy hue." The rich finishes were also continued in the banks directors' room, the ladies' waiting room, and rooms for the bank officers. A marble stair led to the safety deposit vault of the Lincoln Trust and Savings Bank in the basement. "This vault, and especially the door, form one of the most impressive features of this model bank equipment," according to the *Minneapolis Journal*. The 21.5-ton, hardened-steel vault door was "said to be the largest and heaviest in the United States, . . . but is so delicately balanced that a touch of a finger will swing it on the hinges." The upper seven floors, which were leased out for offices, had terrazzo floors, plaster walls, and plastered concrete ceilings.³²

The exterior was similar, but not identical, to Pence's automobile building and featured complementary massing and materials. A contemporary news account observed that "the style of architecture of the building harmonizes with the Pence building, . . . the exterior of each building being of the same shade of terra cotta." When looking west on Eighth Street from the city's main retail corridor, Nicollet Avenue, a block away, the buildings were a well-balanced frame for an urban vista, representing two significant aspects of the new car culture: sales and financing (Figure 2).³³

The bank's connection to the automobile industry remained a constant theme, with automobile road maps given away as a promotion.³⁴ By the time it moved into its new headquarters, though, Lincoln National had expanded its mission. Its original purpose was "to meet the demand for a complete banking service for large corporations and busy businessmen on upper Hennepin. But in less than a year it expanded beyond its original zone of operation and became an institution to service the entire city, and in two years, out grew its quarters and has moved into its new location."³⁵

Lincoln capitalized on its unique location by reaching out to customers, such as women, who might feel out of place in the conservative financial institutions on Marquette or who wanted a safe haven in the retail and entertainment districts. At the same time, women had been empowered by gaining the right to vote in 1920. Three years earlier, their role in the automobile market had been highlighted by car manufacturer Edward S. Jordan, when he observed: "While men buy the cars, women choose them." A community room in the bank was promoted for use by women who were downtown shopping or going to the theater. It was also used for regular meetings of groups such as the Housewives League.³⁶

³¹ "Northwestern National, Minneapolis, Absorbs Lincoln National," 11; "New Lincoln Bank Building Ready for Occupancy May 1," *Minneapolis Morning Tribune*, March 20, 1921; "Lincoln Bank Formally Opens Its New Home," *Minneapolis Morning Tribune*, August 9, 1921; T. B. Walker and Family Papers, 1856-1990; "Death Ends Colorful Career of H. E. Pence"; "At the Gateway to the Land of Plenty." The Fargo location of the Pence Automobile Company, dating from 1920, was also designed by Long, Lamoreaux, and Long and is listed in the National Register for its architectural significance (Noreen Roberts, "Pence Automobile Company Warehouse," National Register Nomination, November 30, 1993).

³² "The Lincoln Bank Building"; "Northwestern National, Minneapolis, Absorbs Lincoln National," 11; "New Lincoln Bank Building Ready for Occupancy May 1," *Minneapolis Morning Tribune*, March 20, 1921; "New Home of the Lincoln Banks Declared Finest in U.S.," *Minneapolis Journal*, August 8, 1921; "Lincoln Bank Formally Opens Its New Home," *Minneapolis Morning Tribune*, August 9, 1921; T. B. Walker and Family Papers, 1856-1990; "Death Ends Colorful Career of H. E. Pence"; "At the Gateway to the Land of Plenty."

³³ "New Home of the Lincoln Banks Declared Finest in U.S.," "Lincoln Bank Formally Opens Its New Home."

³⁴ "Short Cuts in the City News," *Minneapolis Tribune*, June 5, 1922, June 7, 1922, June 9, 1922.

³⁵ "The Lincoln Bank Building."

³⁶ "News of the Clubs," *Minneapolis Tribune*, April 23, 1922; "The Officers of Institution" (advertisement), *Minneapolis Tribune*, September 20, 1921; Cray, *Chrome Colossus*, 205.

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The bank also marketed its convenient location to businesses in the vicinity, automotive and otherwise: "Business Men—Within Hail of Eighth Street! Here's the livest [*sic*] mercantile district in Minneapolis, clustered around Eighth Street, with Lincoln National practically at its center." For those doing international business, Lincoln National promoted its ability to handle transactions involving foreign currency. Lincoln Trust offered investments in mortgage bonds on specific properties, including the "Cadillac Building, 10th St. and Mary Place."³⁷

The bank wooed working class customers as "The Day and Night Bank." Its doors were open from 10:00 in the morning until 10:00 at night during opening festivities. Thereafter, it maintained more normal banking hours most days of the week, closing at 3:00 in the afternoon, but it reopened some evenings, including Saturdays. "It's handy to bank at night," an advertisement proclaimed. In addition to serving laborers, this was also intended to attract another clientele: "Night banking service will be a feature which will meet with popular favor as the Bank is in the midst of Minneapolis' night life."³⁸

A Shift of Ownership

The appointment of a new federal Comptroller of the Currency in 1921 changed the structure of the banking industry by opening the way for consolidation. Previous comptrollers had not allowed national banks to establish branch offices. The new comptroller chose to interpret the law differently and claimed that "there was no restriction on the number of branch offices a bank could establish as long as they were within the city limits mentioned in its charter."³⁹

The two most established banks in Minneapolis, Northwestern National and First National, quickly took advantage of this change in policy by acquiring smaller banks and turning them into branch offices. Northwestern was the first. "The Northwestern National bank, in buying the business of two banks, and converting the quarters of the purchased institutions, established a new policy in national banking in the Northwest," the *Minneapolis Morning Tribune* reported on August 4, 1922. Two of the three new branch offices were housed at 730 Hennepin: Lincoln National Bank and Lincoln Trust and Savings Bank. The third, the South Side State Bank, was in the Cedar-Riverside neighborhood east of downtown. First National jumped in a few days later, acquiring Saint Anthony Falls Bank, the North Side State Bank, and Minnehaha State Bank. As the *Tribune* explained on August 16: "With the two largest downtown banks now operating offices, a new precedent in banking has been established, designed to give banking customers to the outlying sections the same service that is offered at the central banking locations in the downtown sections."⁴⁰ Northwestern National subsequently acquired another five banks and reorganized them to create five branch offices throughout the city. Each was "strategically located to supply every area in the city with the services of a strong bank" and "had been acquired by the big banks to distribute their services on a territorial basis and to increase the earnings of the parent banks."⁴¹

An article in *Commercial West* outlined the details of Northwestern's acquisition of Lincoln. The directors of Lincoln National Bank and the Lincoln Trust and Savings Bank "voted unanimously to merge their entire business" with Northwestern National and its affiliated Minnesota Loan and Trust Company. All of the smaller banks "were in excellent condition and were merged with our [Northwestern National's] business because of the very close relation which has existed for many years between the leading stockholders, officers and directors of each of the three banks with our own institution." Northwestern gained approximately \$4.5 million in deposits from the two Lincoln banks and \$3 million from the South Side bank. It also gained the Lincoln banks' connections to the local automobile industry. Harry E. Pence, E. C. Kischel, and Archie D. Walker, who were officers of the board of directors for Lincoln Bank and the Lincoln Trust and Savings Bank, were made directors of Northwestern National. The officers for the South Side bank were already on Northwestern National's board. The buildings for the original banks were maintained and renamed the Lincoln Office and the South Side Office. Northwestern National bought the South Side building and land, but signed a new twenty-year lease for the Lincoln Office at 730 Hennepin Avenue. Patrons were promised that business would be "as usual and with

³⁷ "Business Men—Within Hail of Eighth Street" (advertisement), *Minneapolis Tribune*, October 25, 1921; "Foreign Business" (advertisement), *Minneapolis Tribune*, October 25, 1920; "7 Percent on Real Estate Mortgage Bonds" (advertisement), *Minneapolis Morning Tribune* November 16, 1920.

³⁸ "The Lincoln Bank Building"; "New Lincoln Bank Building, Modern in All Details, Opens," *Minneapolis Journal*, August 9, 1921; "Lost Motion" (advertisement), *Minneapolis Morning Tribune*, September 2, 1921; "Follow a Definite Plan" (advertisement), *Minneapolis Morning Tribune*, October 9, 1921.

³⁹ Popple, *Development of Two Bank Groups*, 111; "Now Allow Branches of National Banks," *New York Times*, July 22, 1922.

⁴⁰ Popple, *Development of Two Bank Groups*, 111-113; "Increased Facilities" (advertisement), *Minneapolis Journal*, August 3, 1922; "Increased Facilities" (advertisement), *Minneapolis Tribune*, August 4, 1922; "Northwestern Begins Banking in New Offices," *Minneapolis Tribune*, August 4, 1922; "Three Banks Purchased by First National," *Minneapolis Tribune*, August 16, 1922.

⁴¹ Popple, *Development of Two Bank Groups*, 115; Northwestern Bank, Lincoln Office, "Open House" brochure, June 1952, located in the folder, Records of Member Banks, Norwest Bancorporation collection, available at the Minnesota Historical Society, Saint Paul; Northwestern National Bank, "The Northwestern Banks" pamphlet, 1925, available at the Minnesota Historical Society.

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practically the same people, but with the added advantages of doing business with the Northwestern National Bank and its entire facilities, both as to domestic and foreign business." Northwestern immediately promoted the unique qualities of its new facilities: "A distinct feature of the new Lincoln office is the excellent safety deposit equipment. The public is invited to use this department, which is unexcelled in Minneapolis." In addition, "women will find the Lincoln office designed for their particular needs."⁴²

The Lincoln facility at 730 Hennepin Avenue provided Northwestern with a key location in downtown Minneapolis near the bustling entertainment and automobile districts. The Hennepin Avenue address was probably considered a necessary evil given the street's sometimes tawdry reputation. The management at Northwestern was smart enough to recognize the growth potential in the automobile industry, but conservative enough to want to keep some distance between this activity and its headquarters in the financial district. Commercial banks remained wary of involvement with the retail level of the automobile industry through the mid-twentieth century. As historian Charles Popple wrote in 1944:

With the popularization of the automobile, the large Twin City banks had taken up wholesale automobile financing. They loaned money both to dealers and to finance companies, which in turn loaned it to the retail buyers of automobiles. Though banks received a low interest rate on their wholesale loans, while the retailers of credit received a high rate, the banks had avoided retail lending because they considered it undignified. Retail lending involved much grief, and besides it was not good policy for a bank to compete with its own customers. The function of commercial banking was to loan money wholesale at low rates, keeping investments trouble-free and riskless. For years the more aggressive officers had gazed longingly at the retail field, but the older, more conservative men had made firm refusals. The only direct automobile loans made by the big banks had been as a service to their regular customers. During the late 'thirties, the Northwestern in Minneapolis commenced to push retail automobile loans. The First of Minneapolis was more reluctant, but unable to deny the success of other banks, it too, entered the field.⁴³

Even after bank boards decided to actively offer automobile loans, they had difficulty gaining an appreciable share of the market. It was hard to change the mindset of bank officers and employees, who had disparaged this type of business for decades. It was equally difficult to convince consumers that they were welcome: "Formerly the man in the street had felt little direct connection with the great banks other than as a depositor. . . . He thought that the big banks had no interest in his problems and would scorn to make a loan of a few dollars." As the *Minneapolis Morning Tribune* opined: "A Chicago banker is like an icicle to the man who approaches him with any proposition calling for a loan. . . . The idea has now permeated the whole country." Although this article described business loans, the sentiment was even stronger for other types of loans.⁴⁴

Northwestern's exposure to the automobile market through the Lincoln Office helped to ease its entry into retail automobile loans. The Hennepin facility, welcoming and convenient, melted the "icicle" between the "man in the street" and Northwestern. The Lincoln Office continued its ambassador role exclusively at 730 Hennepin Avenue until 1952, when it moved across the street into Pence's former automobile building at 800 Hennepin Avenue, which had been converted into offices in 1930.⁴⁵

Conclusion

The Lincoln National Bank is a local example of the interrelatedness of financial institutions and the automotive industry during the period when cars became an essential part of American life. Harry Pence, an indefatigable entrepreneur, realized that capital would be increasingly important for his car dealerships and local automobile businesses, so he organized a bank to supply that need. The Lincoln Bank Building is the physical manifestation of this relationship. The bank's role quickly expanded in response to opportunities that emerged, in large part, because of its unique location on Hennepin Avenue—a very different setting from the staid financial district where most banks were concentrated. Lincoln took advantage of its prominent location by marketing bank services to a varied clientele that had been underserved by traditional banks, an innovative approach that would be adopted industry-wide in subsequent decades.

⁴² "Northwestern National, Minneapolis, Absorbs Lincoln National," 11; "Increased Facilities for Banking Offered by the Northwestern National Bank" (advertisement), *Minneapolis Journal*, August 3, 1922.

⁴³ Popple, *Development of Two Bank Groups*, 312.

⁴⁴ Popple, *Development of Two Bank Groups*, 313; "Scarcity of Money Tightens Bank Credit," *Minneapolis Morning Tribune*, July 27, 1920.

⁴⁵ Northwestern Bank, Lincoln Office, "Open House" brochure, June 1952, located in the folder, Records of Member Banks, Norwest Bancorporation collection, available at the Minnesota Historical Society, Saint Paul.

Lincoln Bank Building
Name of Property

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Developmental history/additional historic context information (if appropriate)

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T. B. Walker and Family Papers, 1856-1990. Available at the Minnesota Historical Society, Saint Paul.

Previous documentation on file (NPS):

preliminary determination of individual listing (36 CFR 67 has been requested)
 previously listed in the National Register
 previously determined eligible by the National Register
 designated a National Historic Landmark
 recorded by Historic American Buildings Survey # _____
 recorded by Historic American Engineering Record # _____
 recorded by Historic American Landscape Survey # _____

Primary location of additional data:

State Historic Preservation Office
 Other State agency
 Federal agency
 Local government
 University
 Other
Name of repository: _____

Lincoln Bank Building
Name of Property

Hennepin Co., Minnesota
County and State

Historic Resources Survey Number (if assigned):

10. Geographical Data

Acreage of Property 0.2 acres
(Do not include previously listed resource acreage.)

UTM References (NAD 83)

(Place additional UTM references on a continuation sheet.)

1	<u>15</u>	<u>478240</u>	<u>4980489</u>	3	_____	_____	_____
	Zone	Easting	Northing		Zone	Easting	Northing
2	_____	_____	_____	4	_____	_____	_____
	Zone	Easting	Northing		Zone	Easting	Northing

Verbal Boundary Description (Describe the boundaries of the property.)

Lot 12, Block 4 of Hoag and Bell's Addition to Minneapolis.

Boundary Justification (Explain why the boundaries were selected.)

The boundary contains the land that the Lincoln Bank Building sits on.

11. Form Prepared By

name/title Charlene K. Roise and Elizabeth A. Gales
organization Hess, Roise and Company date December 30, 2011
street & number 100 North First Street telephone 612-338-1987
city or town Minneapolis state MN zip code 55401
e-mail roise@hessroise.com; gales@hessroise.com

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A USGS map (7.5 or 15 minute series) indicating the property's location.
A Sketch map for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Continuation Sheets**
- **Additional items:** (Check with the SHPO or FPO for any additional items.)

Lincoln Bank Building
Name of Property

Hennepin Co., Minnesota
County and State

Photographs:

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Elizabeth A. Gales
Date Photographed: December 2010

MN_HennepinCounty_LincolnBankBldg_0001

General view of the building's two primary facades: front on Hennepin Avenue (east, to right) and south on Eighth Street (left). Looking to the northwest.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Elizabeth A. Gales
Date Photographed: December 2010

MN_HennepinCounty_LincolnBankBldg_0002

General view of the front (east) facade (left) and north side (right). Looking to the southwest.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Elizabeth A. Gales
Date Photographed: December 2010

MN_HennepinCounty_LincolnBankBldg_0003

Detail of first two floors of front (east) facade showing the large openings that remain on the first floor and the ornate, well-preserved terra-cotta on the second floor. Looking to the west.

Lincoln Bank Building

Name of Property

Hennepin Co., Minnesota

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Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Elizabeth A. Gales

Date Photographed: December 2010

MN_HennepinCounty_LincolnBankBldg_0004

North side to left; rear (west) side to right. Looking to the southeast.

Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Charlene K. Roise

Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0005

Interior of former banking hall showing marble-clad columns. Opening in foreground can be filled in as part of rehabilitation project, if necessary for integrity. Note the high ceiling and large window area. Looking to the southeast.

Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Charlene K. Roise

Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0006

The former banking hall, with marble-clad columns. A marble wall and door surround are in the background. The elevator lobby is in the alcove to the left. Looking to the northeast.

Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Elizabeth A. Gales

Date Photographed: August 2011

MN_HennepinCounty_LincolnBankBldg_0007

Room with marble-clad columns and walls directly west of main banking hall, below original mezzanine. Looking to the east.

Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Charlene K. Roise

Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0008

Ornate historic metalwork surrounds the two newer elevator doors. Looking to the north.

Lincoln Bank Building
Name of Property

Hennepin Co., Minnesota
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Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Charlene K. Roise
Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0009
Located west of the elevator lobby, the original marble-lined stairway extends from the lower level to the second story.
Looking to the west

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Charlene K. Roise
Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0010
Detail of first-floor landing of original stairway. Looking to the west.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Charlene K. Roise
Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0011
Marble-lined stairway and elevator lobby provide access to vault in basement. Looking to the west.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Charlene K. Roise
Date Photographed: October 2011

MN_HennepinCounty_LincolnBankBldg_0012
The safety deposit vault. The bank claimed that the vault door was the largest and heaviest in the United States at the time of its installation. Looking to the northwest.

Name of Property: Lincoln Bank Building
City or Vicinity: Minneapolis
County: Hennepin State: Minnesota
Photographer: Elizabeth A. Gales
Date Photographed: May 2011

MN_HennepinCounty_LincolnBankBldg_0013
Typical elevator lobby on upper floors, featuring bronze surrounds around the elevator doors, terrazzo floors, mail chute.
Looking to the east.

Lincoln Bank Building

Name of Property

Hennepin Co., Minnesota

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Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Elizabeth A. Gales

Date Photographed: May 2011

MN_HennepinCounty_LincolnBankBldg_0014

The stairway is less ornate on the upper floors. Looking to the south.

Name of Property: Lincoln Bank Building

City or Vicinity: Minneapolis

County: Hennepin

State: Minnesota

Photographer: Elizabeth A. Gales

Date Photographed: May 2011

MN_HennepinCounty_LincolnBankBldg_0015

The floors on the upper levels have a terrazzo finish. Looking to the east.

Property Owner:

(Complete this item at the request of the SHPO or FPO.)

name 100 East 22nd Associates LLC, c/o Eriksson Commercial Real Estate

street & number 2305 Totem Trail

telephone 952-513-0158

city or town Minnetonka

state MN

zip code 55305

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property
County and State
Name of multiple listing (if applicable)

Section number Additional Information Page 1

Figure 1. Lincoln Bank Building, ca. 1925 (Minnesota Historical Society Collections)

Figure 2. View on Eighth Street at Hennepin looking west, Pence Building (National Register listed, left) and Lincoln Bank Building (right), January 16, 1952, Norton and Peel (Minnesota Historical Society Collections)

Figure 3. Vault at Lincoln National Bank, Minneapolis, ca. 1925, Charles P. Gibson (Minnesota Historical Society Collections)

Figure 4. Office interior in the Lincoln Bank Building, January 8, 1957, Norton and Peel (Minnesota Historical Society Collections)

Figure 5. Changing Institutional Patterns for Banks and Theaters in the Central Business District, Minneapolis, from Calvin F. Schmid, *Social Saga of Two Cities: An Ecological and Statistical Study of Social Trends in Minneapolis and St. Paul, 1937*

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property

County and State

Name of multiple listing (if applicable)

Section number Additional Information Page 2

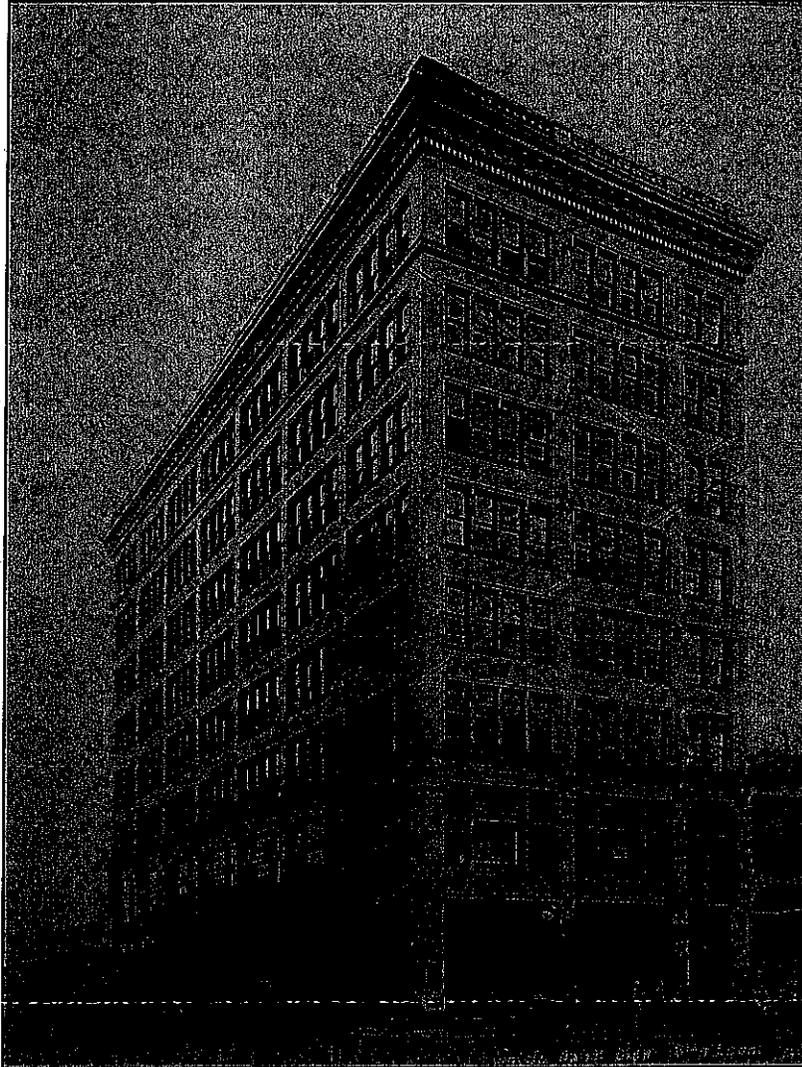


Figure 1.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property

County and State

Name of multiple listing (if applicable)

Section number Additional Information Page 3



Figure 2.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property
County and State
Name of multiple listing (if applicable)

Section number Additional Information Page 4

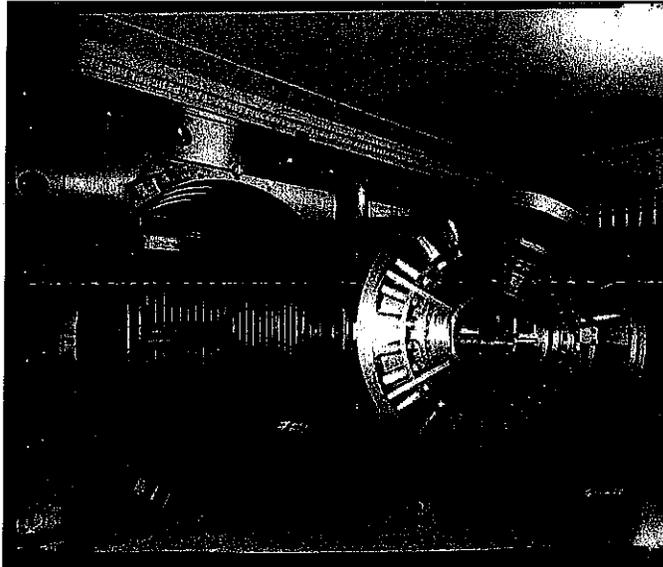


Figure 3.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property

County and State

Name of multiple listing (if applicable)

Section number Additional Information Page 5



Figure 4.

United States Department of the Interior
National Park Service

National Register of Historic Places
Continuation Sheet

Name of Property
County and State
Name of multiple listing (if applicable)

Section number Additional Information Page 6

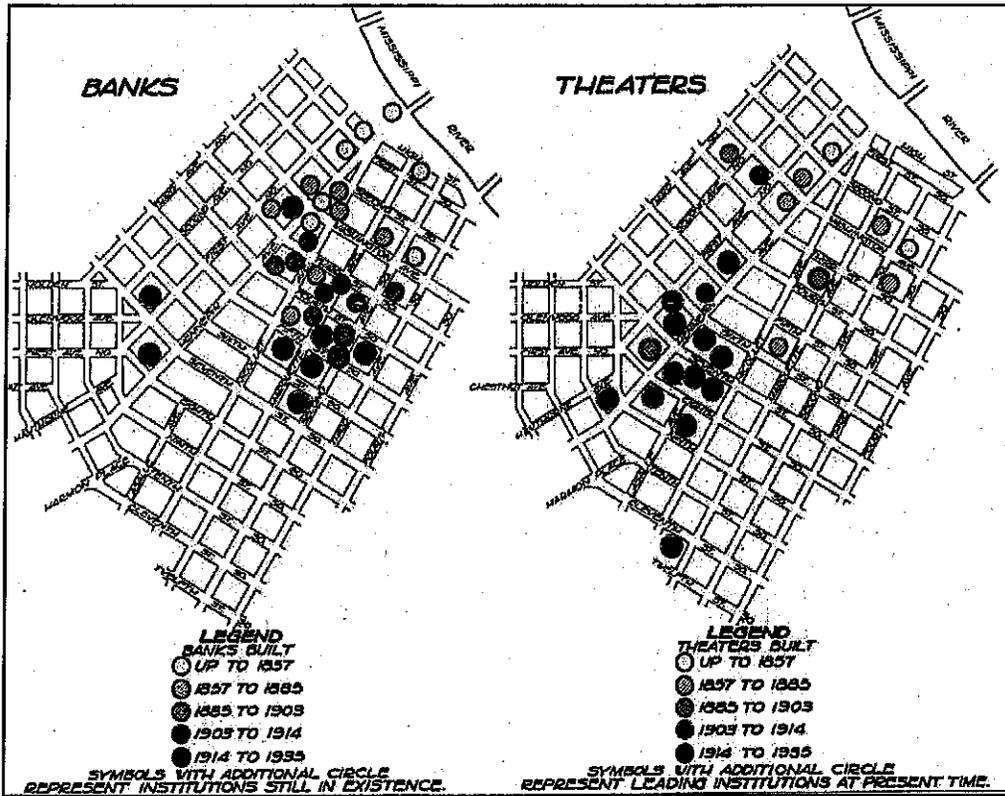


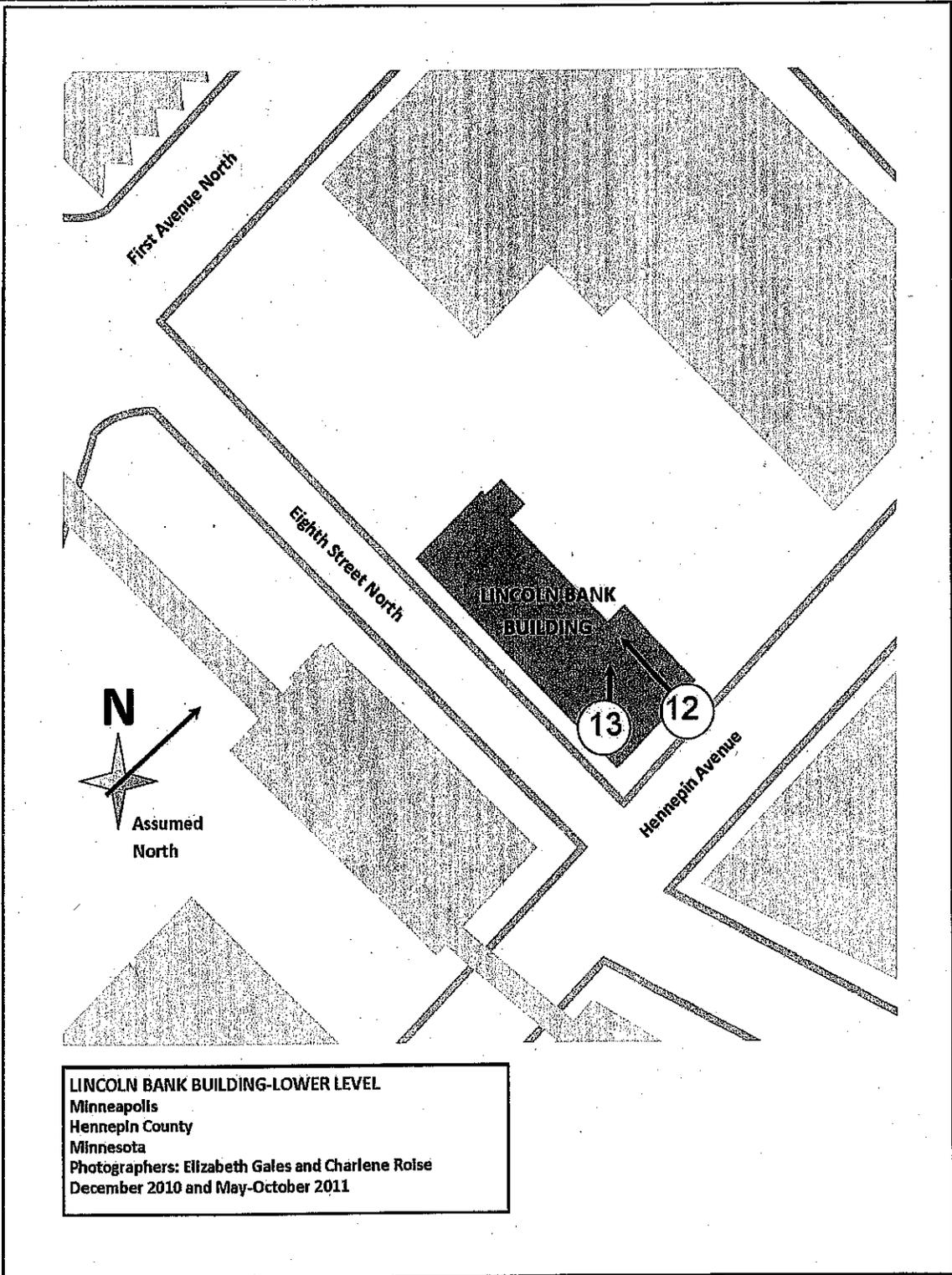
Figure 5.

**United States Department of the Interior
National Park Service**

**National Register of Historic Places
Continuation Sheet**

Name of Property
County and State
Name of multiple listing (if applicable)

Section number Sketch Maps Page 1



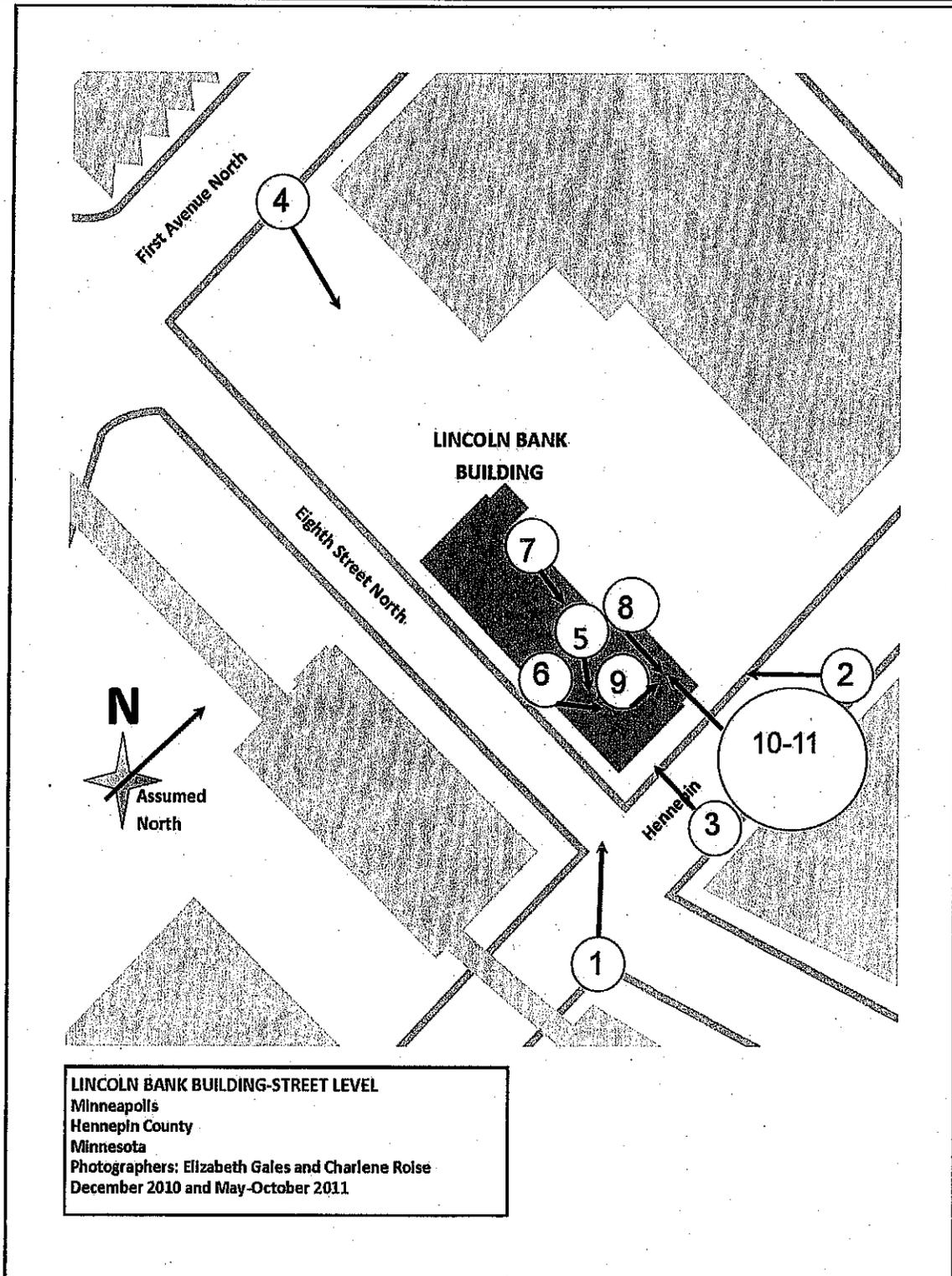
LINCOLN BANK BUILDING-LOWER LEVEL
Minneapolis
Hennepin County
Minnesota
Photographers: Elizabeth Gales and Charlene Roise
December 2010 and May-October 2011

United States Department of the Interior
National Park Service

National Register of Historic Places
Continuation Sheet

Name of Property
County and State
Name of multiple listing (if applicable)

Section number Sketch Maps Page 2



**United States Department of the Interior
National Park Service**

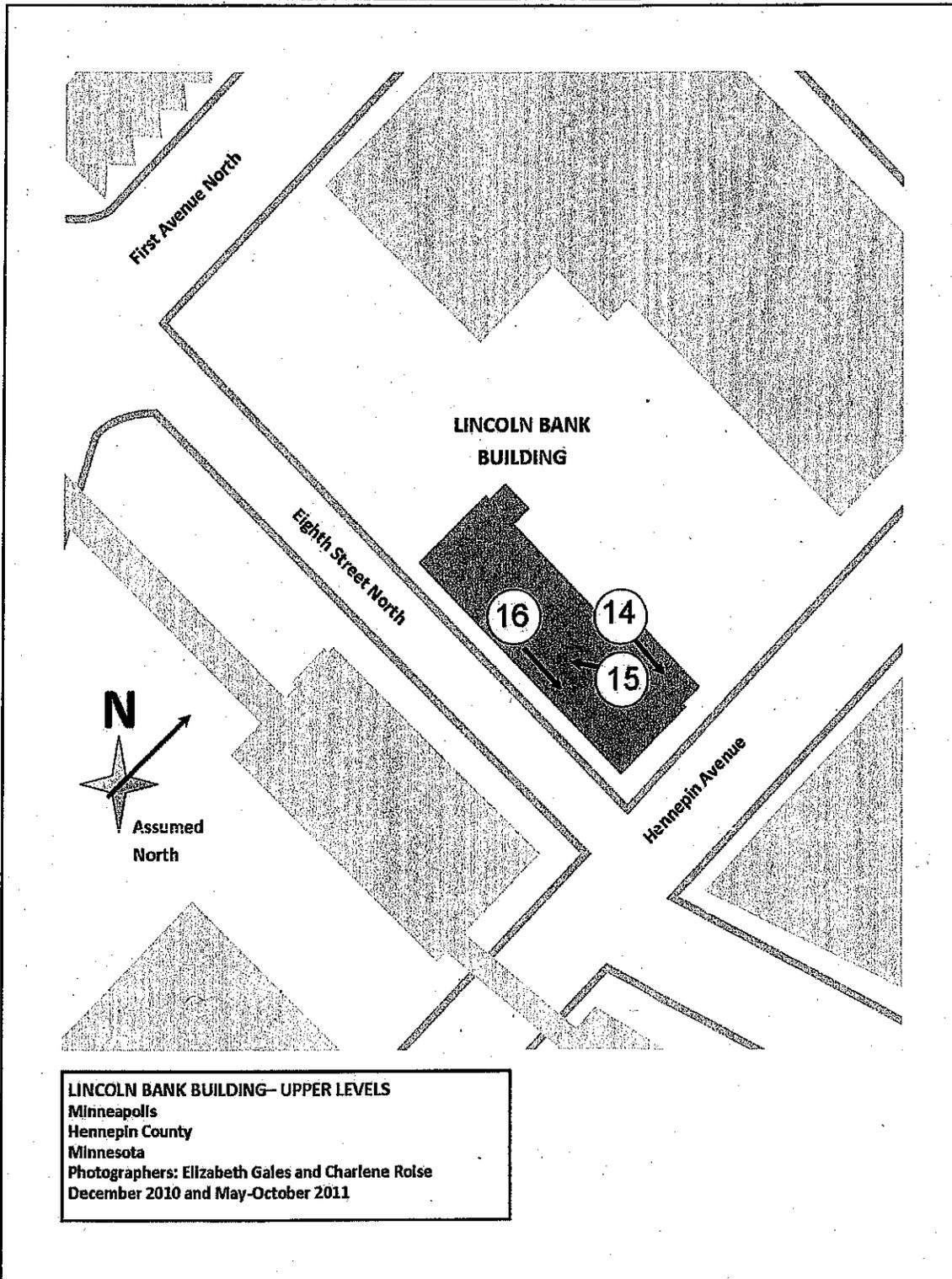
**National Register of Historic Places
Continuation Sheet**

Name of Property

County and State

Name of multiple listing (if applicable)

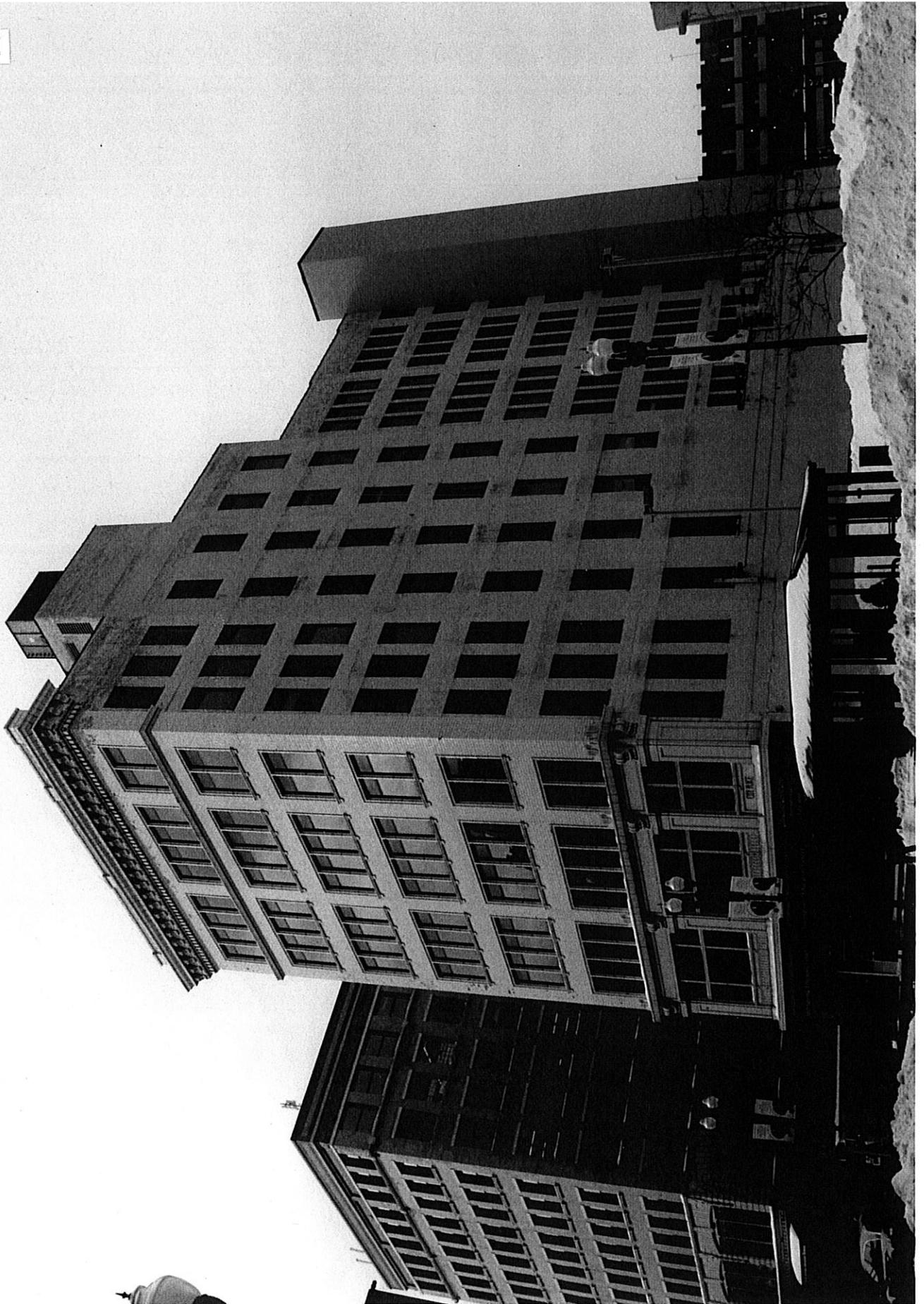
Section number Sketch Maps Page 3

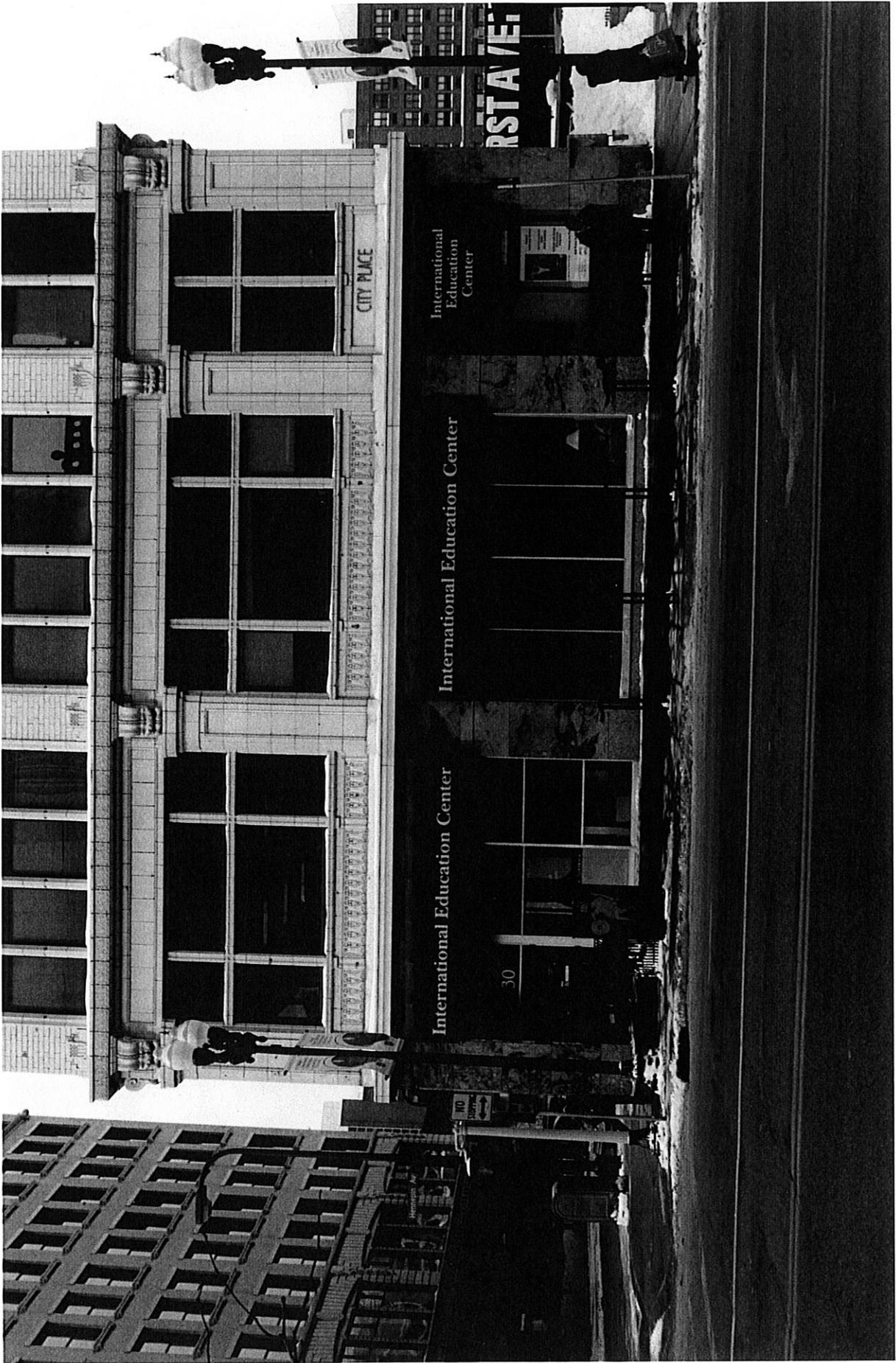


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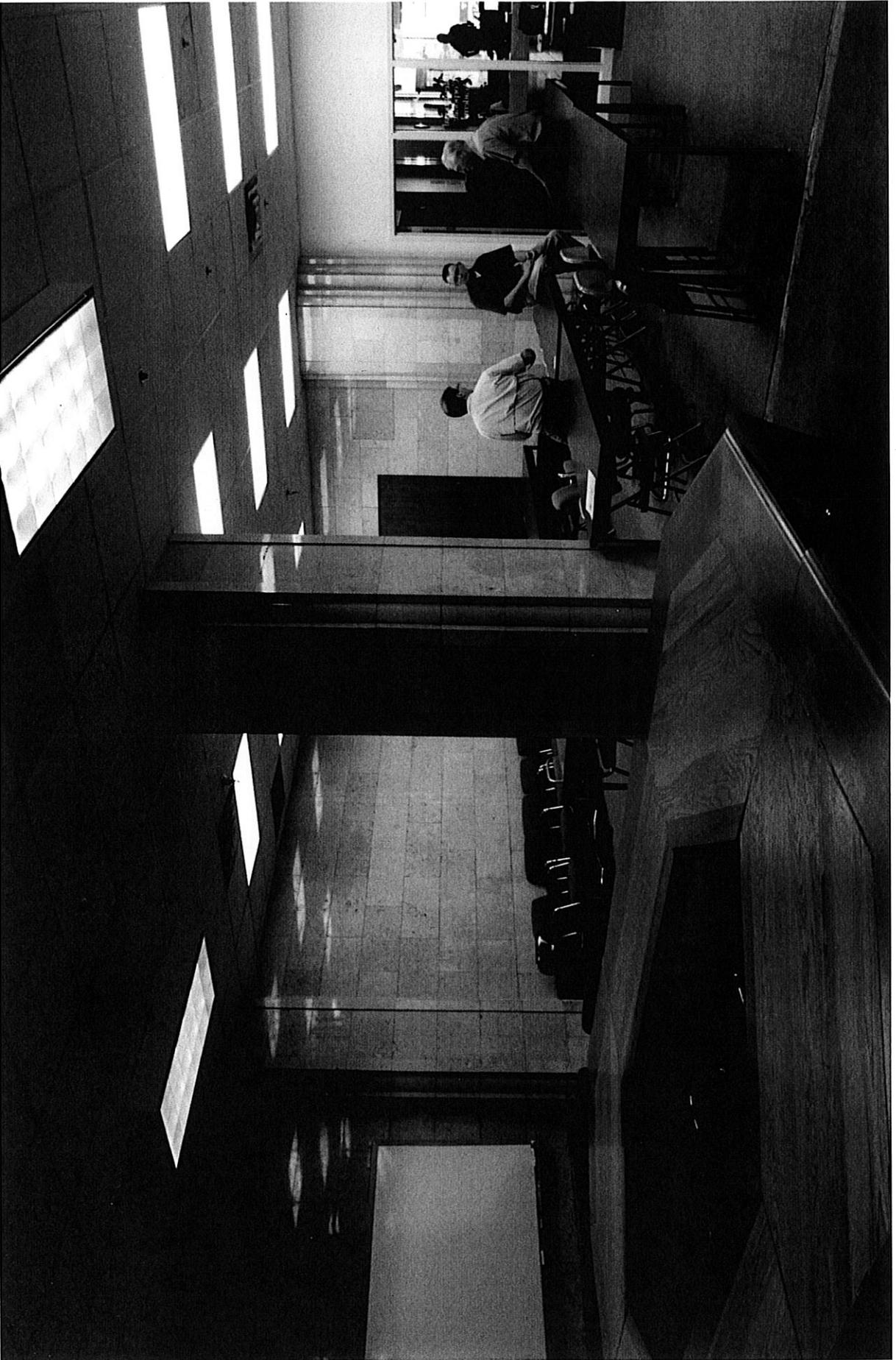




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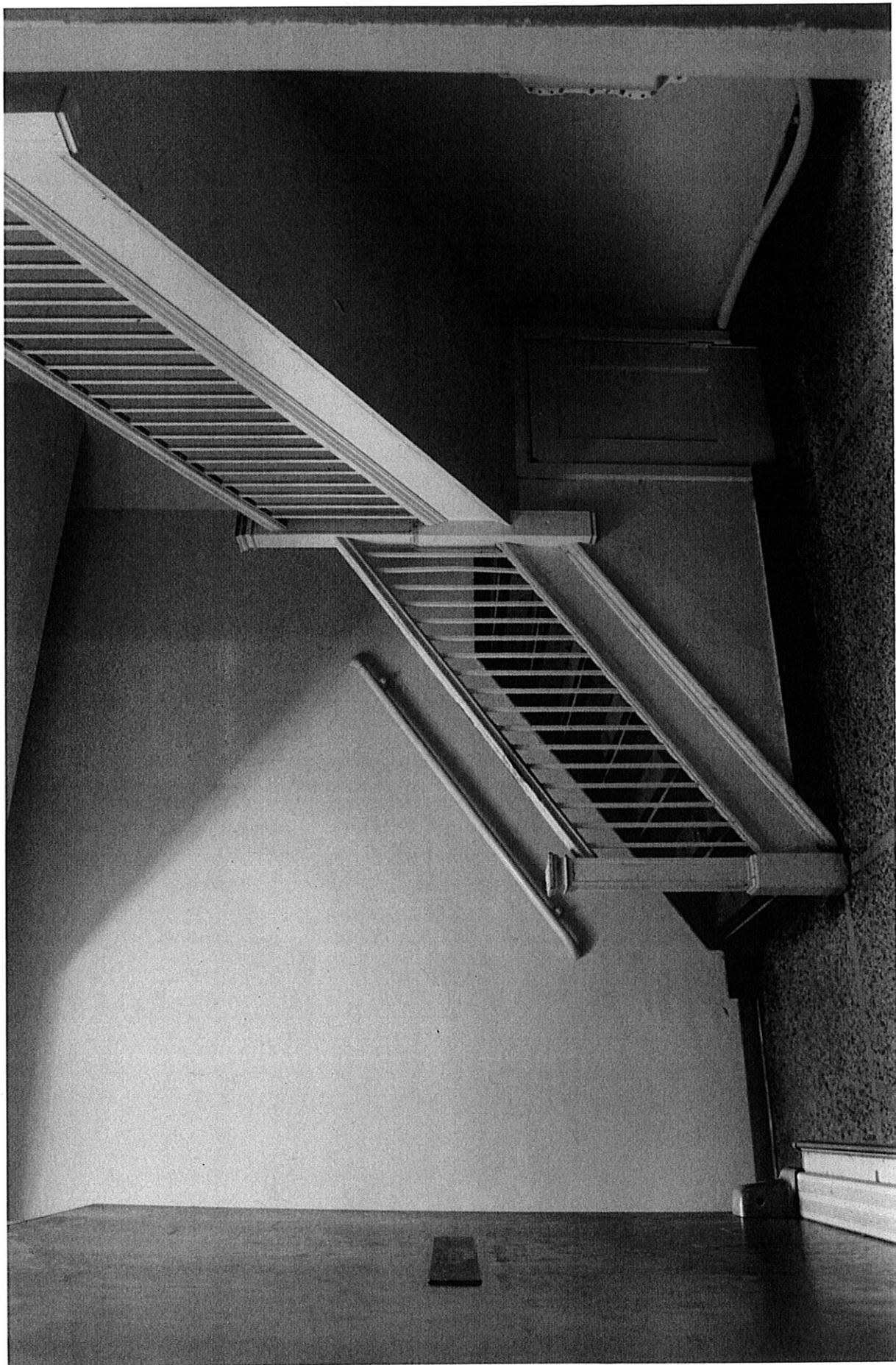






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Minnesota Department of Transportation

Office of Environmental Services
Mail Stop 620
395 John Ireland Boulevard
St. Paul, MN 55155

Office Tel: (651) 366-4292
Fax: (651) 366-3603
E-Mail: dennis.gimmestad@state.mn.us

20 April 2011

Mary Ann Heidemann
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102

RE: Southwest Transitway Project, Hennepin County, Minnesota; Phase I/Phase II
Architecture History Evaluations, Volume Two (part), Minneapolis Downtown Survey
Zone (SHPO # 2009-0080)

Dear Dr. Heidemann:

We are writing to continue Section 106 consultation on the Southwest Transitway
(SWT) project.

Our last letter to you on this project, transmitting Volume One (four suburban zones)
and Volume Three (four railroad zones) of the Phase I/Phase II Architecture History
Investigations, was dated 16 December 2010. We appreciate your response to that
submittal. We are in the process of compiling the information you requested, and will
be forwarding that material to you under separate cover.

Volume Two of the survey report (Hess Roise) includes the five survey zones located
within the city of Minneapolis. As you know, these survey zones include a large
number of evaluations, and we appreciate your willingness to review the individual
zones as they are completed. This submittal includes the two sections of the report
(Section 3.3 and Section 4.3) which pertain to the Minneapolis Downtown Survey
Zone, the list of properties surveyed (Appendix A), and the overall survey research
design (Appendix B). The submittal also includes the inventory forms for the
Downtown Zone.

*You will note that the binder has sections for all five Minneapolis survey zones
included in Volume Two. Please regard the copies of Sections 3.3 and 4.3 as the
final copy for these sections. Future submittals can be placed in the remaining
sections to build the complete Volume Two.*

With regard to historic properties in the SWT Downtown Survey Zone, we have made the following determinations:

1. The following properties are listed in the National Register of Historic Places (NRHP):
 - A. **Basilica of St. Mary** (HE-MPC-0540), 1600 Hennepin Ave.
 - B. **Farmers and Mechanics Savings Bank** (HE-MPC-0354), 88 S. 6th St.
 - C. **Masonic Temple** (HE-MPC-0436), 528 Hennepin Ave.
 - D. **Ogden Apartment Hotel** (HE-MPC-0394), 66-68 S. 12th St.
 - E. **Hennepin (Orpheum) Theatre** (HE-MPC-0439), 910 Hennepin Ave.
 - F. **Pence Automobile Company Building** (HE-MPC-9026), 800 Hennepin Ave.
 - G. **Swinford Townhouses and Apartments** (HE-MPC-0520, HE-MPC-0521), 1213-21, 1225 Hawthorne Ave.
 - H. **Sam S. Shubert Theatre** (HE-MPC-0514), 515 Hennepin Ave.
 - I. **Westminster Presbyterian Church** (HE-MPC-0395), 83 S. 12th St.
2. The following properties have been previously evaluated as eligible to the NRHP, with SHPO concurrence:
 - A. **Handicraft Guild Building** (HE-MPC-0382), 1000 Marquette Ave.
 - B. **IDS Center** (HE-MPC-0367), 701 Nicollet Mall
 - C. **Northwestern National Life Insurance** (HE-MPC-0479), 20 Washington Ave.
 - D. **Warner Brothers Picture Distribution Building** (HE-MPC-0421), 1000 Curie Ave. N.
3. The following properties meet NRHP criteria, based on the findings of this survey and the information noted below:
 - A. **Peavey Plaza** (HE-MPC-3620), 1101 Nicollet Mall, criterion C (landscape architecture, modernist) and criteria consideration G. In the absence of data categories for landscape architecture classification in the NRHP Guidelines, the classification system developed by The Cultural Landscape Foundation at <http://tclf.org/landscapes/glossary> has been used. At this time, we do not conclude that the property meets criterion A (planning and community development).
 - B. **Loring Greenway** (HE-MPC-0534), 1228 Nicollet Mall, criterion C (landscape architecture, modernist) and criteria consideration G. (In the survey report, see the Loring Park Development District Historic District, HE-MPC-16390.) Inasmuch as the Loring Greenway and Peavey Plaza are both modernist landscapes that were designed by M. Paul Friedberg and Associates for the City of Minneapolis during the same period, with the goal of connecting the Nicollet Mall and Loring Park, we conclude that the Loring Greenway meets NRHP criteria as a modernist landscape on the same basis as Peavey Plaza.

- C. **Minneapolis Film Exchange Historic District** (HE-MPC-16980), 1000, 1015, 1019, 1025 Currie Ave. N., criterion A (entertainment/recreation).
- D. **First Baptist Church and Jackson Hall** (HE-MPC-0432), 1020 & 1026 Harmon Place, criterion B (religion) and criteria consideration A.
- E. **Young-Quinlan Building** (HE-MPC-2999), 901 Nicollet Mall, criterion A (commerce), criterion B (commerce).
- F. **Dayton's Department Store** (HE-MPC-5099), 700 Nicollet Mall, criterion A (commerce).
- G. **Murray's Restaurant and Cocktail Lounge** (HE-MPC-0353), 24 S. 6th St., criterion A (commerce).
- H. **Gluek's Bar** (HE-MPC-0350), 16 N. 6th St., criterion A (commerce).
- I. **Northern States Power Company** (HE-MPC-0338), 15 S. 5th St., criterion A (industry). The evaluation lacks a substantive distinct justification for exceptional importance which is required under criteria consideration G. However, the period of significance for the property is 1915-1965, and, because the end of this period is expected to reach 50 years old during the planning and design of the SWT project, we ask that you consider the eligibility of the property at this time.
- J. **Northern States Power Company** (HE-MPC-0450), 414 Nicollet Mall, criterion A (community planning and development). The Gateway urban renewal project is well-established as an important mid-20th century event in Minneapolis. The evaluation identifies characteristics which are strongly associated with properties in the Gateway project, including substantial private investment and design by a prominent architect. The NSP project brought Belluschi's design as well as \$12 million of private investment to the Gateway, compared to \$6.5 million for Northwestern National Life, \$11 million for the Sheraton Center, and \$2.5 for the IBM Building (see Martin and Goddard, *Past Choices/Present Landscapes*, p. 64). The evaluation lacks a substantive distinct justification for exceptional importance which is required under criteria consideration G. However, it is anticipated that the building will turn 50 years old during the planning of the SWT project, so we ask that you consider the eligibility of the property at this time.

4. The following properties are recommended as NRHP eligible in the survey report; it is our determination that they do not meet the criteria:

- A. **Happy Hour Bar and Café** (HE-MPC-7959), 1523 Nicollet Ave., criterion A (entertainment/recreation). This property was the Happy Hour Bar and Café from 1937-1947, Club Carnival from 1948-c. early 1950's, and the Flame from c. early 1950's-1978. Photographs of the building show the exterior during the Club Carnival and Flame periods (see MHS Visual Resources Database negative numbers 26594, 47839, 47840). Today, the two street facades retain the brick pattern and four circular windows. However, many of the building's major character-defining elements have been lost. These elements include the large

signage (including neon), entrance marquee, curved metal panels flanking the entrance, entrance doors, and large display panels on Nicollet Avenue for promoting club performers. It also appears that the interior has undergone substantial change in adapting it to a media production business. Due to the considerable loss of integrity, we conclude that this property does not meet NRHP criteria.

- B. **Loring Park Development District Historic District (HE-MPC-16390)**, criterion A (planning and community development) and criteria consideration G. This district does constitute a distinguishable entity, encompassing properties which were built or incorporated into the area's redevelopment plan between 1974 and 1984. However, the importance of the district within a defined context of redevelopment efforts of the city is not clearly established, and the evaluation lacks the substantive distinct justification for exceptional importance which is required for recent properties under criteria consideration G (see Part IX of the National Register Bulletin "Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past Fifty Years"). We conclude that this district does not meet NRHP criteria at this time. (See 3.B. above for separate comment on the Loring Greenway as an individual property.)
- C. **Orchestra Hall (HE-MPC-0459)**, 1100 Marquette Ave., criterion A and criteria consideration G. With respect to evaluation under criterion A (planning and community development), the importance of the building within a defined context of the redevelopment efforts of the city is not clearly established. With respect to evaluation under criterion A (performing arts), the evaluation discusses the importance of the orchestra from its founding in 1903, but the associations of the orchestra with this building do not begin until 1974. For either of these significance areas, the evaluation lacks the substantive distinct justification for exceptional importance which is required for recent properties under criteria consideration G. We conclude that this property does not meet NRHP criteria at this time.
- D. **Lincoln Bank Building (HE-MPC-0437)**, 730 Hennepin Ave., criterion A (commerce). Lincoln Bank was established by Harry Pence at a location on South Third Street in 1917. The bank moved to newly-built 730 Hennepin Avenue in 1921, and became a branch of Northwestern National Bank in 1922. While the bank may have been a successful institution specializing in meeting the financial needs of the growing automotive industry, it appears that the activities associated with 730 Hennepin were more characteristic than particularly significant in this aspect of the banking industry. The activities of Harry Pence are most strongly associated with the Pence Automobile Company building, located at 800 Hennepin Avenue and listed on the NRHP in 2007. We conclude that the Lincoln Bank Building does not meet NRHP criteria.

- 5. The remaining Phase I and Phase II properties in the SWT Downtown Survey Zone do not meet NRHP criteria.

We will be submitting the evaluations of properties in the other Minneapolis survey zones as they become available.

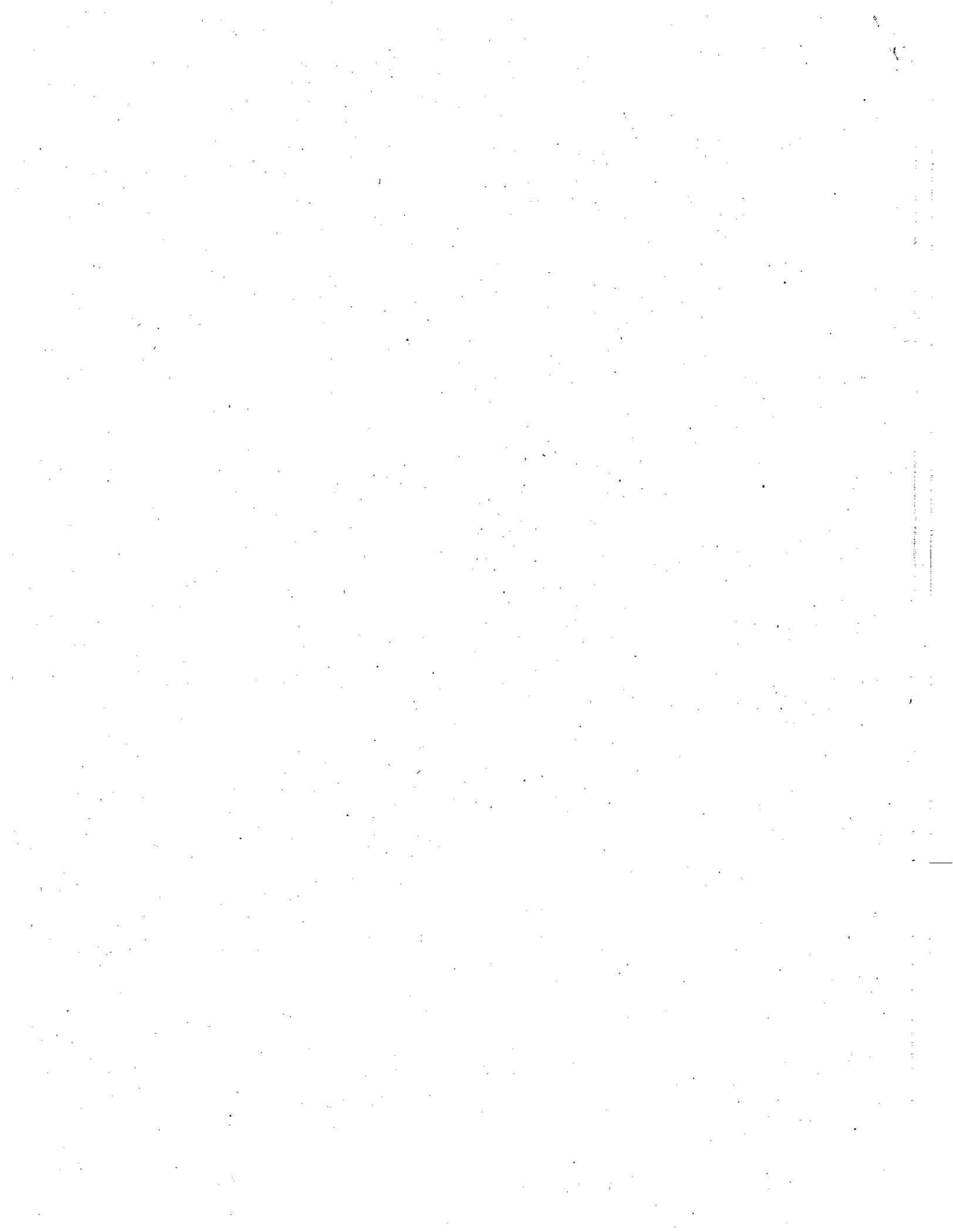
Please submit comments on the Downtown Zone determinations within 30 days of this letter. We look forward to continuing to work with you as the planning process for this project proceeds. Call me at 651 366 4292 with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Dennis Gimmestad". The signature is written in a cursive style with a large, prominent initial "D".

Dennis Gimmestad
Cultural Resources Unit

cc: Bill Wheeler, Federal Transit Administration
Katie Walker, Hennepin County
Ed Hunter, Hennepin County
Kathryn O'Brien, Metropolitan Council
Joe Hudak, Mn/DOT Cultural Resources Unit
Jack Byers, Minneapolis Heritage Preservation Commission
Mn/DOT CRU project file





STATE HISTORIC PRESERVATION OFFICE

June 3, 2011

Dennis Gimmestad
MnDOT Cultural Resource Unit
Transportation Building, MS 620
395 John Ireland Blvd.
St. Paul, MN 55155

RE: Light Rail Interchange
Minneapolis, Hennepin County
SHPO Number: 2011-1404

Dear Mr. Gimmestad:

Thank you for sending additional information on the above project. The materials you sent have been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

Regarding the size of the APE for this project, I note that the City of Minneapolis has concerns similar to ours expressed in the earlier letter. While I understand the need to plan for contingencies, and to recognize the spatial considerations you cite, I would never insist on such a large area, unless accompanied with documentation of potential effect. Having said that, I bow to the wisdom of the Federal agency representative if you wish to survey an area larger than appears to be needed.

For archaeology, our staff archaeologist has reviewed and accepted the archaeological APE as proposed and concurred that, except for the area of Fifth Avenue North you intend to survey further, **no Register-eligible archaeological resources will be affected by this project.** We look forward to receiving and reviewing the report for Fifth Avenue North.

We have reviewed the architectural/history properties where Phase II evaluation has occurred. All but two of these sites have been examined previously by our office, during review of the SW Transitway project (SHPO 2009-0080). Please refer to that project file for details. But to summarize, we concur that the following sites are **eligible** for listing in the National Register of Historic places:

- St. Paul, Minneapolis and Manitoba Railroad Corridor (HE-MPC-16387)
- Gluek's Bar (HE-MPC-16263)
- Regan Brothers Bakery (HE-MPC-16274)
- Minneapolis Film Exchange Historic District (HE-MPC-16980)

cc. John Smoky
Beth Elliot
Beth Grossen
Amanda Arnold
Daniel Frank
Project file
106 file.

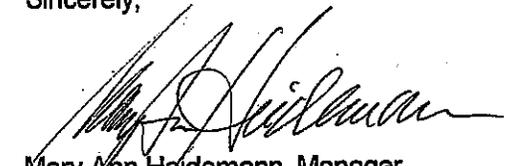
JUN - 7 2011

Further, we concur that the following sites are **not eligible**:

- First Avenue and Seventh Street Entry (HE-MPC-0482)
- Glenwood Redevelopment Area Industrial Zone Historic District (HE-MPC-0482)
- Lincoln Bank Building (HE-MPC-0437) [Note: Additional research still pending]
- Control Data Northside Manufacturing Plant (HE-MPC-16699)
- Control Data Institute (HE-MPC-16694)
- Remaining Phase I and II properties within the Interchange APE

Please contact our Compliance Section at (651) 259-3456 if you have any questions on our review of this project.

Sincerely,



Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis Heritage Preservation Commission



STATE HISTORIC PRESERVATION OFFICE

June 29, 2011

Wendy Bednar, Housing Development Officer
Minnesota Housing Finance Agency
400 Sibley Street, Suite 300
St. Paul MN 55101-1998

RE: City Place Apartments - Rehabilitate 730 Hennepin Avenue for housing and commercial use
Minneapolis, Hennepin County
SHPO Number: 2011-2604

Dear Ms. Bednar:

Thank you for the opportunity to comment on the above project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

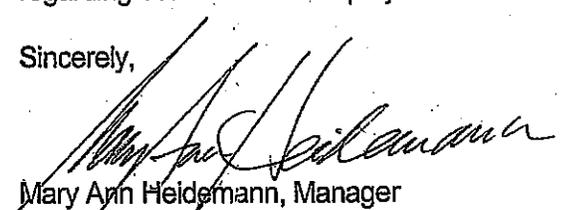
The subject property at 730 Hennepin Avenue is also known as the Lincoln National Bank Building and the Northwest Federal Building (HE-MPC-0437). This property has been previously surveyed, and a tentative determination was made (in connection with the Southwest Corridor Light Rail Project) that the property was not eligible for listing in the National Register. The negative determination is considered tentative, because additional materials were received in support of eligibility in connection with the project referenced above.

At present, the eligibility question has been sent on to Washington, with no recommendation from the Minnesota SHPO, but rather a request for in-depth review by the National Park Service. Completion of our Section 106 review for this project must await the outcome of the National Park Service eligibility determination.

Until the identification phase of this review is complete, it is premature to proceed to a determination of effect regarding changes to the building for adaptive use as housing. We will place your consultation request on hold, pending the outcome of the eligibility determination.

Meanwhile, feel free to contact our Compliance Section at (651) 259-3456 if you have any questions regarding our review of this project.

Sincerely,


Mary Ann Heidemann, Manager
Government Programs and Compliance

cc: Jack Byers, Minneapolis HPC
Charlene Roise, Hess, Roise and Company

*C.C. PPK file
106 file
John Smoley
Beth Elliot*

JUN 30 2011

