

Department of Community Planning and Economic Development
Certificate of Appropriateness
BZH-27728

Date: May 14, 2013

Proposal: Replacement of two existing family play areas

Applicant: Minneapolis Park & Recreation Board (MPRB)

Address of Property: 4901 46th Avenue South and 4901 Minnehaha Avenue

Project Name: Minnehaha Regional Park Playground Improvements

Contact Person and Phone: Minneapolis Park & Recreation Board (MPRB), Attn: Andrea Weber,
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CPED Staff and Phone: Becca Farrar-Hughes, 612-673-3594

Date Application Deemed Complete: April 2, 2013

Public Hearing: May 14, 2013

Appeal Period Expiration: May 24, 2013

Ward: 12

Neighborhood Organization: Longfellow Community Council, Nokomis East Neighborhood Association, and Standish-Ericsson Neighborhood Association

Concurrent Review: N/A

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CLASSIFICATION:	
Historic District	Minnehaha Historic District
Period of Significance	n/a
Criteria of Significance	-Minnehaha Creek, Falls and Glen -Cultural landscape -Architectural, Commerce, Conservation, Literature and Transportation as well as preserves the environment of historic sites illustrating commercial, transportation, pioneering and architectural themes – a foresight in urban planning.
Date of Local Designation	1986 (National Designation in 1969)
Applicable Design Guidelines	- <i>The Minnehaha Park Renovation Plan</i> - <i>Secretary of Interior Standards for Treatment of Historic Properties</i>

PROPERTY INFORMATION:	
Current name	Minnehaha Park
Historic Name	Minnehaha Park
Current Address	4901 46 th Avenue South and 4901 Minnehaha Avenue
Historic Address	Various (between Hiawatha Avenue and the Mississippi River with Nawadaha Boulevard bordering the region on the north)
Original Construction Date	n/a
Original Contractor	n/a
Original Architect	Horace W.S. Cleveland (1883)
Historic Use	Industrial, residential settlements, park
Current Use	Park
Proposed Use	Park

BACKGROUND:

Minnehaha Park is locally designated (1986) within the Minnehaha Historic District boundaries and is listed on the National Register of Historic Places (1969). Minnehaha Park is part of the Minneapolis Grand Rounds park system designed by landscape architect Horace W.S. Cleveland and implemented by Theodore Wirth. The boundary of the park aligns with the Minnehaha Historic District boundaries. The park’s historic sites illustrate commercial, transportation, pioneering, and architectural themes and is an expression of inspired foresight into urban and park planning. Minnehaha Park’s contributing features are both natural and manmade. The natural elements include the Creek, Falls and Glen. The four contributing manmade structures include the following: Godfrey Mill (1853/1854) the Minnehaha Station (1870s), the John H. Stevens House (built in 1849 moved to the park in 1896) and the Longfellow House (1906).

The Minnehaha Park Renovation Plan was completed in 1992. The master plan was developed to provide guidance via a long-range improvement plan. The plan identifies several distinct study areas within the park, including the Wabun Picnic Area and the North Plateau Area. Many improvements have been made to Minnehaha Regional Park since *The Minnehaha Park Renovation Plan* was completed in 1992. Most recently completed improvements include bank stabilization and re-vegetation along the creek in the Lower Glen; a reconfiguration of the Wabun Picnic Area that includes new picnic shelters, wading pool, restroom building, trails, state-of-the-art parking lots, and maintenance building. Playground replacement would be the last major investment in the park which is included in the master plan.

The Wabun Picnic Area, located in the northeast portion of the park, south of East 46th Street and north of the Minnesota Soldiers Home, was initially developed as a park amenity in the 1920s as an automobile campground called the Minnehaha Auto Tourist Camp. Auto tourist camps coincided with the emergence of the automobile and predated the modern day motel, providing both permanent and temporary structures for sleeping quarters. In the mid-1950s the camp was converted to the Wabun Picnic Area.

The North Plateau Area, south of Nawadaha Boulevard, east of Minnehaha Avenue and north and west of the Glens, is the principal arrival point to the Park and Falls, with several vantage points for viewing the Falls. The vicinity is defined as the area surrounding the Refectory/Pavilion.

The Heritage Preservation Commission has reviewed several past certificate of appropriateness applications for properties within the boundaries of the Minnehaha Park Historic District regarding the most recent improvements as noted above.

SUMMARY OF APPLICANT'S PROPOSAL:

The Minneapolis Park & Recreation Board (MPRB) has applied for a certificate of appropriateness application to allow for the replacement of two existing family play areas within Minnehaha Park located on the properties at 4901 46th Avenue South and 4901 Minnehaha Avenue. Minnehaha Park is located on the National Register of Historic Places and locally designated within the Minnehaha Historic District. The applicant proposes to replace play areas in the Wabun Picnic Area as well as the in the North Plateau Area; both sites are located in the northern portion of the park and are accessed off of Godfrey Parkway.

Wabun Picnic Area

The existing play area located in the Wabun Picnic Area is a timber-based structure that was constructed in 1973. The play features are limited and outdated as the size and type of the play components isn't reflective of physical and cognitive abilities of different age groups. Further, there is no accessible route to either play area and no accessible surfacing. The applicant proposes to replace the existing play area with one that meets "Universal Access" standards of at least 70% accessibility.

The proposed play area would have a historic "Auto Tourist Camp" theme, as the previous use of the site from the 1920s to the 1950s was the Minnehaha Auto Tourist Camp. The entire play area would be surfaced with accessible play turf. The play area would include the following features:

Play area for ages 2-5

- A small play structure lined with play turf (synthetic grass) would be incorporated that includes ramps, a rocking feature custom designed to look like a 1930s teardrop camper, a freestanding classic car play feature as well as small mounds in the ground to play on;
- A swing bay lined with play turf (synthetic grass) would be included that has a total of 8 swings; 4 belt, 2 bucket and 2 ADA swings;
- The sand play area would include at least 2 standing ADA sand diggers and possibly a sand table. A custom tent shaped sun shade may possibly be added over the sand play area;
- A quiet play area would be lined with woodchips and include at least 2 play tents with sensory panels along with some boulders for seating themed as a campfire.

Play area for ages 5-12

- The play area lined with play turf (synthetic grass) includes a full circuit in the lower level under raised decks and ramps that is more compact and vertical even though it is a Universal Access structure. The structure overall is more than 90% accessible;
- Two freestanding elements are also included in this area, a roller table and an accessible merry-go-round. Additional freestanding play features and play panels may be added depending on additional funding;
- Interpretative signage and a gateway planting feature will also be included.

No tree removals are planned for this project.

North Plateau Area

The existing play area located on the North Plateau consists of several free-standing metal pieces of play equipment in a sand surface area with a wood timber container. There are no accessible routes or surfacing. The play equipment in this area was audited in January of 2012. Two pieces of equipment were recommended for removal (freestanding slide and overhead horizontal ladder). The swings 4 bays will be reviewed to determine whether hardware is available to correct some of the safety concerns identified. If not, the swings will be removed; if the pieces can be retained they will be integrated into the new play area with accessible surfacing added.

The proposed play area would incorporate a mixture of play equipment with dual themes of classic/retro play and the “Longfellow Gardens” Zoo. The classic/retro play themes have been designed to tie into the existing WPA (Works Projects Administration) swings and climber. The new pieces would include freestanding slides, fulcrum see-saws, merry-go-rounds, an overhead ladder, balance beams, stepping pods, crawl tunnels, concrete animal climbers, sand diggers and a sand table. Classic molded metal animal spring rockers and climbers will also be included as an interpretative feature to recall the “Longfellow Gardens” Zoo. Accessibility for this area will meet ADA requirements. The surfacing in this location would be the more traditional sand with poured in place rubber for access routes. An ornamental fence consistent with other fences in the park will be added between the path and the nearby paths and walkways.

Two small trees would need to be relocated or removed as part of the project.

Outreach Efforts

The design process for both replacement play areas included multiple efforts by MPRB Staff for feedback and communication from the following sources: (1) a Technical Advisory Committee that included staff from MPRB Design and Planning and Disability specialists, Falls for All representatives, and representatives from the Courage Center, the Minnesota Veterans Administration, Minneapolis Public Schools Special Education Department, and MN STAR program; (2) a Project Advisory Committee included staff from MPRB facilities, grounds, maintenance, forestry, police, and recreation CSA leaders; (3) an Open House #1 (verbal and written comments); (4) On-line surveys (three; 1st on the park in general, 2nd on preliminary concepts, 3rd on final concepts); (5) Children's Input Workshop (Hiawatha School Park Rec Plus Participants); (6) Individual interviews with organizations supporting people with disabilities; (7) Introduction to the project at Minneapolis School Special Ed meeting.

The area noticed included a three-block mailing for the first Open House (and for the Public Hearing). News releases, gov-delivery e-mails and postings on the Facebook page for the project were completed before each public meeting/survey.

PUBLIC COMMENT:

Staff has not received any official correspondence from the Longfellow Community Council, Nokomis East Neighborhood Association or Standish-Ericsson Neighborhood Association prior to the printing of this report. Any correspondence received prior to the public hearing will be forwarded on to the Heritage Preservation Commission for consideration.

The applicant has consulted with SHPO throughout the design and development process. That correspondence has been attached for reference. The correspondence indicates that both play areas must be designed to ensure that the new construction is compatible with the historic district. The correspondence indicates that with one exception, all of SHPO's concerns have been addressed to date. The one remaining item is the proposed use of synthetic surfacing materials in the playground area; specifically synthetic grass. SHPO would prefer either rubber tiles or poured-in-place rubber over synthetic grass as SHPO believes that the synthetic grass gives a false sense of history that is contrary to the Secretary of the Interior's Standards. Further, SHPO believes that if new materials are needed to address modern concerns that the new materials should be clearly differentiated from the historic materials. They are also concerned about potential cumulative effects if it becomes routinely used in play areas throughout the Grand Rounds.

As described above, in the summary of the applicant's proposal, the play turf (synthetic grass) is only proposed in the Wabun Picnic Area specifically in the swing bay, and the ages 2-5 and 5-12 play areas. There is also a sand play area and the quiet play area is lined with woodchips. The North Plateau site would use sand with poured in place rubber on ADA access routes.

CERTIFICATE OF APPROPRIATENESS: Certificate of appropriateness to allow for the replacement of two existing family play areas within Minnehaha Park.

Findings as required by the Minneapolis Preservation Code:

The Minneapolis Community Planning and Economic Development Department has analyzed the application based on the findings required by the Minneapolis Preservation Ordinance. Before approving a certificate of appropriateness, and based upon the evidence presented in each application submitted, the commission shall make findings based upon, but not limited to, the following:

(1) The alteration is compatible with and continues to support the criteria of significance and period of significance for which the landmark or historic district was designated.

Minnehaha Park, in its entirety, was listed on the NRHP in 1969 and locally designated in 1986. There is no applicable period of significance for this district; however, the Grand Rounds Park System, an overlapping feature, has a period of significance of 1884-1942. As previously noted, within the park designation there are several historic features that are identified including historic structures, archaeological sites, as well as the Creek, Falls and Glen. The Wabun Picnic Area is not near or visible from any of the specifically identified features and the North Plateau is several hundred feet north of the Falls. Further, the design of the new play areas is thematically appropriate given the historical context. For these reasons, the alterations are compatible with and continue to support the criteria of significance for which the district was designated.

(2) The alteration is compatible with and supports the interior and/or exterior designation in which the property was designated.

The park's historic sites illustrate commercial, transportation, pioneering, and architectural themes and is an expression of inspired foresight into urban and park planning. Minnehaha Park's contributing features are both natural and manmade. While there are historic structures located within the park and therefore, within the district, the proposal to allow for the replacement of two existing play areas would have no adverse impacts on these structures. The proposed alterations are compatible with and support the designation of the district. The overall impact of the proposed replacement play areas on the district as a whole would be negligible.

(3) The alteration is compatible with and will ensure continued integrity of the landmark or historic district for which the district was designated.

The proposed work would not affect the park's location, design, setting, materials, workmanship, feeling, or association and would not, therefore, affect the park's integrity. The proposed project is compatible and supports the historic district designation as it does not result in adverse impacts on the park or any of the significant features that contribute to the park's designation. Further, views from these significant features to the project areas, Wabun Picnic Area and the North Plateau Area, are limited.

As previously noted, SHPO has one remaining concern regarding the proposal; this is specific to the proposed play turf surfacing material (synthetic grass) proposed within the Wabun Picnic Area swing bay, and the ages 2-5 and 5-12 play areas. SHPO would prefer either rubber tiles or poured-in-place rubber over synthetic grass as SHPO believes that the synthetic grass gives a false sense of history that is contrary to the Secretary of the Interior's Standards. SHPO believes that if new materials are needed to address modern concerns that the new materials should be clearly

differentiated from the historic materials. They are also concerned about potential cumulative effects if it becomes routinely used in play areas throughout the Grand Rounds.

Staff would disagree with SHPO in this circumstance as the proposed play turf surfacing materials are limited in their application, the surfacing selection is relatively temporary with a life span of 10 to 15 years, it is reversible, and the appearance is different than natural grass thus allowing for individuals to distinguish between old and new. Further, the design of the play areas was meant to incorporate features and surfacing materials for all children including those with different types of disabilities, including sensory disorders. Research indicates that play turf areas appeal to the tactile/sensory preferences of children.

- (4) The alteration will not materially impair the significance and integrity of the landmark, historic district or nominated property under interim protection as evidenced by the consistency of alterations with the applicable design guidelines adopted by the commission.**

There are no adopted specific design guidelines associated with the Minnehaha Historic District. *The Minnehaha Park Renovation Plan* is a master plan that was developed to provide guidance via a long-range improvement plan. The plan identifies several distinct study areas within the park, including the Wabun Picnic Area and the North Plateau Area. The general guidance provided by the plan indicates that both play areas in the park be replaced with accessible, custom designed, unique to the park and of high construction quality play areas. More specifically, the plan states that both play areas be designed to complement and enhance the natural and rustic qualities of this portion of the park. The proposed alterations would not materially impair the significance and integrity of the historic district.

- (5) The alteration will not materially impair the significance and integrity of the landmark, historic district or nominated property under interim protection as evidenced by the consistency of alterations with the recommendations contained in The Secretary of the Interior's Standards for the Treatment of Historic Properties.**

The proposed alteration is compatible with the guidelines of *The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards for Rehabilitation)*. The proposal to replace two play areas in the park would comply as a rehabilitation project that meets Standard 1, Standard 2, Standard 3, Standard 9, and Standard 10.

Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

Standard 3: Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future the essential form and integrity of the historic property and its environment would be unimpaired.

- (6) The certificate of appropriateness conforms to all applicable regulations of this preservation ordinance and is consistent with the applicable policies of the comprehensive plan and applicable preservation policies in small area plans adopted by the city council.**

The project would comply with Policy 8.1 which states that the City will, “Preserve, maintain, and designate districts, landmarks, and historic resources which serve as reminders of the city's architecture, history, and culture,” as well as implementation step 8.1.1, which states: “Protect historic resources from modifications that are not sensitive to their historic significance.”

The proposed project is consistent and compatible with *The Minneapolis Plan for Sustainable Growth* and *The Minnehaha Park Renovation Plan*.

Before approving a certificate of appropriateness, and based upon the evidence presented in each application submitted, the commission shall make findings that alterations are proposed in a manner that demonstrates that the applicant has made adequate consideration of the following documents and regulations:

- (7) Adequate consideration of the description and statement of significance in the original nomination upon which designation of the landmark or historic district was based.**

The applicant submitted a statement outlining how they feel the proposed work meets the guidelines of *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Please see the applicant's statement which is attached for reference.

- (8) Where applicable, Adequate consideration of Title 20 of the Minneapolis Code of Ordinances, Zoning Code, Chapter 530, Site Plan Review.**

The proposal does not trigger Site Plan Review as required by Zoning Code Chapter 530.

- (9) The typology of treatments delineated in the Secretary of the Interior's Standards for the Treatment of Historic Properties and the associated guidelines for preserving, rehabilitating, reconstructing, and restoring historic buildings.**

The applicant submitted a statement indicating that the alteration makes adequate consideration for the treatments delineated in the *Secretary of the Interior's Standards for the Treatment of Historic Properties* as the proposed scope of work is compatible and the project alterations are reversible.

The application, complies with the rehabilitation guidelines of *the Secretary of the Interior's Standards for the Treatment of Historic Properties* as discussed in finding #5 above.

Before approving a certificate of appropriateness that involves alterations to a property within an historic district, the commission shall make findings based upon, but not limited to, the following:

- (10) The alteration is compatible with and will ensure continued significance and integrity of all contributing properties in the historic district based on the period of significance for which the district was designated.**

As proposed, the alterations proposed are compatible with the surrounding historic properties and the Minnehaha Historic District. The proposed alterations, especially in the context of the entire historic district and the park, are minor and are in keeping with local and federal design guidelines as noted above.

- (11) Granting the certificate of appropriateness will be in keeping with the spirit and intent of the ordinance and will not negatively alter the essential character of the historic district.**

The spirit and intent of the City of Minneapolis' Heritage Preservation Regulations is to preserve historically significant buildings, structures, sites, objects, districts, and cultural landscapes of the community while permitting appropriate changes to be made to these properties. The granting of the certificate of appropriateness to allow for replacement play areas would be in keeping with the spirit and intent of the ordinance and would not negatively alter the essential character of the historic district as the proposed alteration is appropriate and would not have a negative impact on the surrounding historic properties and district.

- (12) The certificate of appropriateness will not be injurious to the significance and integrity of other resources in the historic district and will not impede the normal and orderly preservation of surrounding resources as allowed by regulations in the preservation ordinance.**

Granting the certificate of appropriateness with the conditions of approval listed below would not be injurious to the significance and integrity of other resources in the historic district nor would it impede the normal and orderly preservation of surrounding resources as allowed by regulations in the preservation ordinance. The proposed replacement play areas are thematically appropriate given the historical context, would not have any visual impacts on the overall character of the district and are consistent with *The Minnehaha Park Renovation Plan*.

STAFF RECOMMENDATION

The Department of Community Planning and Economic Development recommends that the Heritage Preservation Commission adopt the above findings and **approve** the Certificate of Appropriateness to allow for the replacement of two existing family play areas within Minnehaha Park located on the properties at 4901 46th Avenue South and 4901 Minnehaha Avenue subject to the following condition(s):

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1. All workmanship must be completed in conformance with the Secretary of Interior Standards, see: <http://www.nps.gov/history/hps/tps/standguide/>.
2. The Applicant shall obtain all other necessary City approvals prior to the commencement of work.
3. By ordinance, approvals are valid for a period of two years from the date of the decision unless required permits are obtained and the action approval is substantially begun and proceeds in a continuous basis toward completion. Upon written request and for good cause, the planning director may grant up to a one year extension if the request is made in writing no later than May 14, 2015.
4. By ordinance, all approvals granted in this Certificate of Appropriateness shall remain in effect as long as all of the conditions and guarantees of such approvals are observed. Failure to comply with such conditions and guarantees shall constitute a violation of this Certificate of Appropriateness and may result in termination of the approval.
5. Final plans shall comply with *The Minnehaha Park Renovation Plan* as noted within this report.

Attachments:

1. Project description and applicable C of A findings
2. Correspondence – Ward 12 & Longfellow Community Council, Nokomis East Neighborhood Association, and Standish-Ericsson Neighborhood Association
3. Plans
4. Photos