

## STATE HISTORIC PRESERVATION OFFICE

January 11, 2018

Lisa Cerney  
Deputy Director and City Engineer  
City of Minneapolis, Public Works  
350 South Fifth Street, Room 203  
Minneapolis MN 55415

RE: Peavey Plaza Rehabilitation Project  
1111 Nicollet Avenue  
Minneapolis, Hennepin County  
SHPO Number: 2017-1327

Dear Ms. Cerney,

Thank you for the opportunity to comment on the proposed Peavey Plaza Rehabilitation Project (Project). It is our understanding that the City of Minneapolis will be utilizing a state capital grant for the proposed Project, as allocated to the City by the State of Minnesota. As such, the Project is being reviewed pursuant to the responsibilities given to the State Historic Preservation Office by Minnesota Historical Society under the Minnesota Historic Sites Act (M.S. 138.665-666) and the Minnesota Field Archaeology Act (M.S. 138.40).

We have completed a review of the 90% design submittal package as issued by the City on 21 November 2017 for the proposed Project. This 90% design submittal was received in our office on 22 November 2017. Staff of the State Historic Preservation Office, including myself and Historical Architect Natascha Wiener, have attended several Technical Committee and Stakeholder meetings since we last wrote to the City on 24 October 2017 following our office's review of the 60% design submittal. Thank you for extending invitations to our staff to participate in these consultation meetings, as well as the City's inclusion of representatives from other historic preservation consulting parties. In our opinion, these meetings have continued to be an effective way to facilitate meaningful consultation and have informed our reviews.

As you are aware, **Peavey Plaza** is a historic property which was listed in the National Register of Historic Places (NRHP) in January 2013. Peavey Plaza is listed under NRHP Criterion A (Community Planning and Development) for its locally significant role in the revitalization of downtown Minneapolis and Criterion C (Landscape Architecture) as a nationally significant example of an M. Paul Friedberg-designed urban park plaza in the Modernist style. The property's Period of Significance is 1975, the year construction of the plaza was completed. Because the property was less than 50 years old at the time of listing, the property also meets NRHP Criteria Consideration G for exceptional significance. At the time of listing, it was determined that the property retained a very high level of historic integrity for a 1970s American Modernist urban park plaza.

To reiterate from our 5 July 2017 comment letter on the 30% design, in order for our office to determine that the proposed rehabilitation will not adversely affect this historic property, the Project must be designed in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* and corresponding *Guidelines for the Treatment of Cultural Landscapes* (collectively referred to as Standards). It is our understanding that the City's goal for the proposed Project's scope of work, as described thus far, is intended to result in a design which will be in conformance with the Standards for **Rehabilitation**, as this treatment allows for continued preservation of the historic property through both repair and in-kind replacement of existing features and materials as well as alterations required for continued contemporary use, including accessibility, public safety, and environmental/sustainability.

We have completed our review of the 90% design package which included overall rehabilitation narrative descriptions organized by the historic property's character-defining historic landscape features and appendices with appropriate supporting documentation and current site photographs, as well as the corresponding 90% design plans entitled *Peavey Plaza Rehabilitation* (20 November 2017).

We appreciate the thorough narrative summary of proposed rehabilitation work as well as the summary of the stakeholder engagement process that has occurred since the City's submittal of the 60% design submittal.

On 21 December 2017, our office requested via e-mail to the City, clarification on some aspects of the 90% design submittal package and a request for delay of providing formal comments until such time as we had a chance to discuss. This e-mail was followed up by a brief conference call on 22 December 2017, a summary of questions provided via email to the City by the SHPO also on December 22<sup>nd</sup>, and the submittal of additional documentation from the City to our office on 2 January 2018. The project's additional consulting parties were copied on the City's January 2<sup>nd</sup> response to our office.

We are referring to both the November 21<sup>st</sup> review request 90% submittal AND the responses and additional documentation provided with the City's January 2<sup>nd</sup> email when referencing the "90% submittal" in our comments below.

We have also received a copy of the summary notes, as prepared by Coen + Partners, from the 14 December 2017 meeting with other historic preservation consulting parties to discuss water feature rehabilitation design. SHPO staff were not available to attend the December 14<sup>th</sup> meeting.

The previously submitted narratives for the proposed rehabilitation work at the 30% stage was organized by the six (6) Peavey Plaza districts as defined by the 2015 Historic Structures Report (HSR) with sub-descriptions of proposed work by character-defining historic landscape features for each district. Our 5 July 2017 comment letter followed this same format and also included overall summary comments for the whole historic property. Neither the previous 60% narrative nor the current 90% narrative follow the district breakdown, and instead are organized by historic landscape character-defining features with specific work descriptions by district under each feature. Although we agree that the submittal's format is appropriate to provide an understanding of the overall impact to the historic property, our comments and recommendations on this 90% submittal will follow a format similar to those we provided at the 30% and 60% phases.

#### **District 1 – Upper Plaza**

- Spatial Organization, Circulation, and Concrete Structure – As with the 60% design submittals, the spatial organization of this district will generally not be altered and one grass turf planting bed will be restored (as discussed in Vegetation/Plantings below) and this work is reflected in the 90% submittal. The proposal to complete localized repairs to historic concrete in this district appears unchanged from the 60% design stage and additional details are provided with the 90% submittal. Based upon our review of the additional details at 90%, our comments at the 60% stage are still valid.
- Vegetation/Plantings – The verification provided in the 90% submittal provides justification for the proposed installation of *Euonymus fortunei* (wintercreeper) within the tree base planting beds in this district. We appreciate the incorporation of the restoration of the historic turf area in the Lower Amphitheater into the 90% plans (this area is also partially located in District 2 – Nicollet Terraces). The restoration of this character-defining Spatial Organization/Circulation feature is a critical aspect of the overall Rehabilitation treatment approach for this historic property.
- Water Features – There are no historic water features in this district.
- Furnishings and Objects – The additional documentation included in the 90% submittal for proposed replication and reinstallation of hanging tree lights and the specifications for the installation of "puck" light fixtures within existing handrails indicates appropriateness to the Rehabilitation treatment approach.

### **District 2 – Nicollet Terraces**

- **Spatial Organization and Circulation** –It is our understanding that the City has considered full or partial restoration of additional turf-surfaced “rooms” in this district as recommended in our letter following review of the 60% design, and, taking into consideration the need for accessible pathways in this district, this City has been able to incorporate into the current 90% plans the preservation of part of the Lower Nicollet Grass Plinth. We appreciate the inclusion of this turf area in the 90% rehabilitation design. We also appreciate the clarification that the pipe railings to be installed on top of the new ramp retaining walls in this district will have a baluster/post spacing of 14” on center to conform with other historic railing configurations in Peavey Plaza. We appreciate the additional details regarding the foundation and support structure of the new ramps and walls in this district.
- **Concrete Structure** — The proposal to complete localized repairs to historic concrete in this district appears unchanged from the 60% design stage and additional details are provided with the 90% submittal. Based upon our review of the additional details at 90%, our comments at the 60% stage are still valid and the work supports the Rehabilitation treatment approach.
- **Vegetation/Plantings** – With the proposed inclusion of a partially preserved lower grassy plinth, and the fact that there have been no major changes to the design from the 60% stage, our earlier finding that the proposed design element is designed in conformance with the Standards remains unchanged. Please see comment above in regards to restoration of grassy turf area in Amphitheater Lower Level which partially falls within this district and District 1 – Upper Plaza.
- **Water Features** – There were no changes in the 90% submittal from what we reviewed at the 60% stage, therefore our earlier finding that the proposed work is designed in conformance with the Standards is unchanged.
- **Furnishings and Objects** – Based upon the details which have been provided to our office in the 90% submittal, it appears that the proposed rehabilitation of light fixtures (repair of existing and in-kind replacement of historic lighting types), installation of new lighting in handrails, and rehabilitation of site furnishings, including wood seat blocks, wall-hung benches, and trash receptacles supports the Rehabilitation treatment approach. This comment regarding Furnishings and Objects is applicable to all other districts discussed below.

### **District 3 – Main Fountain**

- **Spatial Organization and Circulation** – The general scope of rehabilitation remains unchanged from the 60% submittal, and design details provided in the 90% submittal as well as the revised details provided in the follow-up materials that the City sent via e-mail on 1/2/2019 as it pertains to the installation of the false bottom in the Main Fountain basin supports the Rehabilitation treatment approach. This comment applies to both this feature and Water Features for District 3.
- **Concrete Structure** – The proposal to complete localized repairs to historic concrete in this district appears unchanged from the 60% design stage and additional details are provided with the 90% submittal. Based upon our review of the additional details at 90%, our comments at the 60% stage are still valid and the work supports the Rehabilitation treatment approach.
- **Vegetation/Plantings** – There were no changes to vegetation/plantings from the 60% design, therefore our comments on the 90% submittal remain unchanged.
- **Water Features** – See comments under “Spatial Organization and Circulation” above.
- **Furnishings and Objects** – See comments provided above under District 2 above.

### **District 4 – 12<sup>th</sup> Street Terraces**

- **Spatial Organization and Circulation** – The scope of rehabilitation and modifications in this district at 90% design is generally unchanged from what was reviewed by our office at the 60% stage. The proposed work at 90% supports the Rehabilitation treatment approach.
- **Concrete Structure** – The proposal to complete localized repairs to historic concrete in this district appears unchanged from the 60% design stage and additional details are provided with the 90% submittal. Based upon our review of the additional details at 90%, our comments at the 60% stage are still valid and the work supports the Rehabilitation treatment approach.

- Vegetation/Plantings – We appreciate the fact that the City has now revised the original proposal to replace the declining Little Leaf Lindens with new Ginkgo trees and will now replace the declining trees in-kind with new Little Leaf Lindens. The existing healthy trees will be protected and preserved as part of the rehabilitation project. The preservation of these tree species in this District, along with the proposed restoration of the green, turf terrace “rooms” will be beneficial in maintaining the historic integrity of the historic property. We also appreciate the clarification that the Lower Fountain Planters (also partially located in District 6) and the sloped planting beds will be replanted with Juniperus horizontalis per the original design. The proposed work supports the Rehabilitation treatment approach.
- Water Features – The lower fountain feature is located primarily in District 6 so our comments on the proposed rehabilitation will be discussed below.
- Furnishings and Objects – See comment above under District 2 above.

#### **District 5 – Concert Hall Promenade**

- Spatial Organization and Circulation – The proposed rehabilitation work is generally unchanged from what we reviewed at the 60% stage, therefore our previous comments are still valid.
- Concrete Structure – Localized concrete repairs proposed at both the 30% and 60% stages appear unchanged at the current 90% design, as do the in-kind replacement of Bridges 4 and 5. Thank you for providing clarification regarding the necessity to modify the width of replacement Bridge 3, and that this modification is required in order to meet accessibility requirements. We appreciate the fact that the City has accepted our office’s recommendation to salvage and reuse as many of the historic exposed aggregate pavers as possible in the East Patio/Amphitheater Lower Level areas and this specification for salvage and reuse was more clearly indicated on the revised 90% Sheets D-031 – D-033 which were submitted to our office via e-mail on 1/2/2018. See additional comments below as they pertain to our recommendation to continue consultation regarding the final selection of an appropriate exposed aggregate paver to match the historic for those pavers that cannot be reused. The proposed work in this District supports the Rehabilitation treatment approach.
- Vegetation/Plantings – We appreciate the City’s consideration of recommendations made following our review of the 60% plans which requested consideration of full or partial restoration of the grassy turf surfaces on Concert Hall Island. Further discussion and additional renderings provided at consultation meetings in October and November 2017 helped our office understand how and why full restoration of this feature would not be feasible and partial restoration would not meet Standards. We appreciate the City’s inclusion of restoration of the small planting area between the ramp and the Concert Hall Garden as identified by our office at the 60% review. The proposed work at 90% supports the Rehabilitation treatment approach.
- Water Features – Thank you for providing details and narrative regarding the proposal to install additional lighting within the runnels in order to increase nighttime visibility of these features. The proposed work at 90% supports the Rehabilitation treatment approach.
- Furnishings and Objects – See comments provided under District 2 above.

#### **District 6 – Lower Pool**

- Spatial Organization and Circulation – Aside from the proposal to eliminate the depth of the lower pool, which is further discussed below, the spatial organization and circulation of this district, which is comprised primarily of the lower pool, the lower fountain, and planters, will generally be preserved. This work supports the Rehabilitation treatment approach.
- Concrete Structure – The proposal to complete localized repairs to historic concrete in this district appears unchanged from the 60% design stage and additional details are provided with the 90% submittal. Based upon our review of the additional details at 90%, our comments at the 60% stage are still valid.
- Vegetation/Plantings – In response to comments made by our office at the 60% stage, the City has provided clarification regarding the results of additional research which indicate that the Lower Fountain Planters (also partially in District 4) were likely planted with “spreading juniper” or Juniperus horizontalis which supports the

proposed planting plan in the 90% submittal. The proposed design at 90% supports the Rehabilitation treatment approach.

- **Water Features** – The 90% submittal presents a significantly modified design from what our office reviewed at the 60% stage, regarding the way that the Lower Pool will be filled in and the floor of the pool will be raised from the historic depth of 2 feet to ¼ inch. We now understand that the method to raise the height of the floor will include installation of a system of cast-in-place concrete walls which will support precast concrete planks upon which the exposed dark grey/brown granite basin pavers will be installed thereby creating the new floor of the ¼ inch pool. We have completed a review of the narrative description, corresponding drawings, and additional details and clarifications provided in the 12/14/2017 meeting summary and 1/2/2018 e-mail response from the City. While our earlier finding that the proposed filling in of the historic Lower Pool will be an adverse effect remains valid, the City has worked to minimize this adverse effect through successive design modifications. The proposed concrete wall and plank system currently proposed at 90% appears to further minimize direct impacts to the Lower Pool feature and therefore may align more closely with the Standards in that it may be a reversible alteration if the City decides to restore the Lower Pool at some time in the future. Thank you for providing clarification regarding the proposal to install a stainless steel “bridge” edging piece between the new basin floor and the historic basin coping. The City has assured our office that this is the best design solution at this location and for the function of the new basin water system and will not damage the adjacent historic concrete surfaces. Although this character-defining feature, which encompasses the entirety of this district and is a major feature of the historic property will be adversely affected, the proposed design at 90% supports the Rehabilitation treatment approach.
- **Furnishings and Objects** – There are no historic furnishings or object elements in this district.

#### **Comments Pertaining to All Districts -**

**Paving** – While our office is comfortable with the documentation presented thus far in terms of the proposed replacement of the historic 8-inch by 8-inch clay tile pavers with the Belden Beehive Bricks in “Ebony Black” – a sample of which our office and other consulting parties had the opportunity to review last fall – as an in-kind match and we are also comfortable with the proposed Cold Spring “Mesabi Black” granite pavers which will constitute the floor of the new ¼ Lower Pool basin, we do not feel that we have been provided sufficient documentation and samples to agree with the determination that the proposed replacement exposed aggregate paver is an appropriate in-kind match to the historic pavers of this type. Because the City anticipates that a number of the historic exposed aggregate pavers will be salvaged and reused as part of the project, it will be very important to select a replacement paver that is an in-kind match. The samples that our office and other consulting parties had the opportunity to review earlier this fall were not an in-kind match and, although the specifications and cut sheet provided with the 90% submittal looks like it could be a better match with the historic, it cannot be fully determined based upon the documentation provided to our office at this time. Similar to the exposed aggregate replacement paver, while the 90% submittal provides narrative and specification sheets for the proposed permeable paver system that will be installed in areas that had historically been grassy turf areas, and for which accessibility requirements will not allow for grass to be restored as part of this project, we do not feel that we have been provided sufficient documentation in the form of renderings or other images that show how this grass turf replacement permeable paver system will look and provide visual justification for the proposed design’s compatibility with the adjacent historic character-defining features and the historic property as a whole. We request that the City provide our office with an appropriate opportunity to review the proposed material samples in comparison with existing, historic materials and features, if possible, in an effort to determine compatibility and conformance with the Rehabilitation treatment approach.

**Concrete Repair Specifications** – While our office has reviewed the specifications, as provided in the November 21st 90% submittal, for repairs to historic cast-in-place concrete and these specifications are appropriate and support the Rehabilitation treatment approach, the subsequently received 12/14/17 meeting summary notes indicate that the City’s design team had received historic concrete repair specifications from the Minnesota Department of Transportation and will be incorporating these specifications into the final construction documents. Please provide our office the opportunity to review and comment on any revised specifications if they are, in fact, significantly modified from what was provided to our office with the 90% submittal.

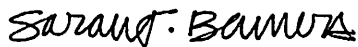
**Summary Comments**

To follow up on comments we made in our October 24<sup>th</sup> letter following our review of the 60% design submittal, we continue to believe that significant improvements have been made to the proposed rehabilitation of Peavey Plaza and therefore, although there will be a significant adverse effect to a major character-defining feature of this historic property, it is our office's opinion that the current 90% design, with appropriate design responses to the two unresolved issues outlined above, when considered cumulatively, is consistent with the Secretary of the Interior's Standards and Guidelines for the Rehabilitation of historic properties and that Peavey Plaza will retain sufficient historic integrity to remain listed in the National Register of Historic Places following the successful completion of the City's project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

We look forward to continuing consultation with the City and other consulting parties as we seek ways to resolve the adverse effect through development of, and eventual written agreement on, appropriate mitigation measures. Please feel free to contact me at 651-259-3456 or [sarah.beimers@mnhs.org](mailto:sarah.beimers@mnhs.org) if you wish to discuss the comments and recommendations presented in this letter.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance

*cc via e-mail only:*

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