



IN REPLY REFER TO:

## United States Department of the Interior

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

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December 11, 2007

Andrea Kajer  
Deputy Director of External Relations  
Minnesota Historical Society  
345 Kellogg Blvd West  
St. Paul, MN 55102-1906

Dear Ms. Kajer:

The Minnesota Historical Society is proposing a project that could have great beneficial effects and, possibly, significant adverse effects on the Fort Snelling National Historic Landmark. To ensure that significant adverse effects do not occur, the National Park Service must conduct a thorough and careful review. Part of doing so means knowing exactly what is significant in the area affected. Section 106, 800.5, Assessment of adverse effects, defines an adverse effect as one that "may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association."

The purpose of providing historical background for a Section 106 review, then, is to identify and evaluate a site's significant qualities so the reviewers can weigh the potential impacts of a project on those qualities. The historic context provided should clearly and directly tell the reader about the site's overall historical significance and the significance of each contributing element. The Society's report discusses a little of the overall context but rarely ties it to the contributing or potentially contributing elements. Specifically, the documentation submitted to date provides few details about the historical significance of Buildings 17, 18, 22 or 30. We have detailed our concerns in the attached comments.

Many reasons demand that the historical documentation provided for this project be of the highest and best quality possible. Fort Snelling is one of Minnesota's most important historic sites. The two organizations most responsible for historic preservation at Fort Snelling are involved, and we will set a standard that many others will look to, good or bad. And we must emphasize again the requirements of federal agencies when dealing with National Historic Landmarks. The Advisory Council's regulations (36 CFR 800.10) state:

(a) *Statutory requirement.* Section 110(f) of the act requires that the agency official, **to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark** that may be directly and adversely affected by an undertaking.

We know the Society's project will directly affect the NHL, but we cannot complete a sound evaluation of the effects without substantive documentation. The documentation presented to date does not allow us meet the Statutory requirement.

If you have questions about these comments, please let us know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul Labovitz". The signature is written in dark ink and is positioned above the typed name.

Paul R. Labovitz  
Superintendent

**Fort Snelling  
Minnesota Historical Society Proposal  
December 11, 2007**

**Comments on Adequacy of Documentation for Section 106 Review**

**Site History**

The Society's presentation of the site history is lacking in four areas: organization, context, evaluation and assessment of effects. The Secretary of the Interior's Standards Guidelines for Preservation Planning and the Secretary's Standards and Guidelines for Identification, Historical Documentation and Evaluation and the Section 106 process all provide guidance on the requirements in each area. As we have mentioned before, the review process for this project must be of the highest standard because Fort Snelling is a National Historic Landmark. 36 CFR 800.10 of the Advisory Council's regulations says:

(a) Statutory requirement. Section 110(f) of the act requires that the agency official, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.

We have not yet met this standard.

The Assessment of Adverse Effects, in 36 CFR 800.5, says "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." The purpose of providing historical background for a Section 106 review is to tell the reviewing agency, interested parties and the public exactly what a site's significant qualities are so all parties can determine how those qualities could be affected by the proposed project.

Organization

A clear and understandable presentation on the historic resources potentially impacted by the Society's proposal would first identify and provide the history behind the relevant historical contexts associated with Fort Snelling. It would then look specifically at the area affected and determine whether any spaces or buildings in that area fit any of the historical contexts and explain why or why not. For those that fit the historical contexts identified, the study would evaluate their significance and integrity. Then it would address the effects of the proposed undertaking on the significant historic resources.

At this point, we do not have an organized or thorough presentation of the historic contexts for Fort Snelling. We do not have an adequate evaluation of the potentially significant spaces and features in the affected area under those contexts. As a result, we cannot make a fully informed assessment of the effects.

## Context, Identification and Evaluation

Standard I, Preservation Planning Establishes Historic Contexts, says that

The historic context organizes information based on a cultural theme and its geographical and chronological limits. Contexts describe the significant broad patterns of development in an area that may be represented by historic properties. The development of historic contexts is the foundation for decisions about identification, evaluation, registration and treatment of historic properties.

We need this foundation.

The historic context provided should clearly and directly tell the reader about the site's overall historical significance and the significance of each contributing element. The Society's report discusses a little of the overall context but rarely ties it to the contributing elements. As we stated in earlier comments, the report entitled "From Frontier to Country Club," has some substantive background information, but it does not specifically identify all the contexts and does not relate what is presented to the Lower Post area. The history provided in the Society's other documents gives few details about the buildings or the area around them. We need to know what the qualities of the buildings and the surrounding area are to complete our evaluation.

Buildings 17, 18, 22 and 30 may have important stories to tell, stories integral to one of Minnesota's most important historic sites and integral to the development of the nation's military history. The Society needs to consider how Buildings 17, 18, 22 and 30 are contributing structures to the Fort Snelling NHL and under what contexts. As neither the National Register nomination nor the NHL nomination provides a detailed history of these buildings, the Society must do so for this review. We cannot make a responsible decision about the treatment of these buildings or the lands around them without such a review.

The report argues that during the last part of the nineteenth century, the Lower Post became a "backwater" and of "lower rank" to the rest of the fort. However, each part of the fort had specific functions that played into the fort's overall operations during each of its historical periods. The life and function of each area changed over time as the fort's mission changed, but it appears that the Army never quit using the area. A study that focused on the historic contexts of Fort Snelling would assess structures and spaces within the Lower Post area based on their contribution or representation of a given context, not on whether they appear to be of lower rank or in a backwater area.

In the very short section on Expansion in the Twentieth Century, the report spends almost a page telling us about plans for the cavalry buildings that did not get built. We do not see how this context helps us understand the significance of the buildings the Army did build. The report, it appears, uses the text to argue against the significance of Buildings 17 and 18, suggesting that the as-built design was spurious or not well thought out. Without supporting evidence, the report dismisses the Cavalry Barracks, calling them "a cobbled-together string of buildings that were neither distinctive nor well-positioned." A little later, the report belittles the Barracks as "The



Johnny-come-lately cavalry barracks . . .” It further minimizes their significance by saying, “The presence of Buildings 17 and 18 was further diminished by their alignment with Tower Avenue, which skewed them away from the parade grounds.” And once more, on p. 17, the report disparages the cavalry area. Here the report states, “Had planning for the cavalry facility not been focused on the old fort but, instead, occurred at the same time as planning for the artillery barracks, it seems likely that the placement and physical relationship of both sets of barracks would have been more graceful.” Finally, the report suggests that the artillery buildings probably took the space that the cavalry could have used, and concludes: “While pragmatic, this was a departure from the army’s aesthetic ideal of ringing the parade grounds with barracks and other relatively ornate structures.” So it appears that the Society sees the buildings as neither graceful nor aesthetically placed. It is perplexing and disappointing to find the Minnesota Historical Society so strongly disparaging a major component of one of the state’s most important historic sites.

The Army had a rationale for putting the cavalry barracks and stables along the Mississippi River. Looking at maps and aerial photographs, it seems the Army let the landscape of two great rivers frame the fort’s outside boundaries, projecting off the point occupied by the frontier fort. However, we should know what the Army was thinking in its own words.

The history of Fort Snelling’s overall site plan is important to understanding the relationship of the buildings to each other and to their historic contexts. As the Society’s report says, Fort Snelling’s site plan varies from other posts. This makes it unique and we should know the Army’s rationale for it. The Society needs to conduct more research to flush this out.

The historical assessment of the Cavalry area needs to define the historic contexts under which the Buildings 17, 18, 22 and 30 could be significant and then weigh each building against those contexts. For example:

The 1993 “Cavalry Barracks, Buildings 17 & 18 Study,” says that the Cavalry used the Buildings 17, 18 and 30 from 1904 to 1911. It also discusses what troops came and went during this period. The Society needs to define the Cavalry context at Fort Snelling and in the U.S. military, examine the history of the Cavalry at the fort and especially in this area of the fort, and then evaluate these buildings in light of these and any other relevant contexts.

The Army used Works Progress Administration (WPA) funding to build the infill structures in 17 and 18, as well as for other structures on the Upper Post. This suggests that there is a WPA context for Ft. Snelling that the Society needs to define. The fact that the Army added these additions in the 1930s suggests that this part of the fort was active then. Once defined, the Society needs to determine how the infill structures fit under the context and then evaluate their significance.

The 1993 “Barracks Study” also reports that Buildings 17 and 18 “housed Japanese Americans, and students of the Military Intelligence Service Language School.” The treatment of Japanese Americans during World War II is a national story. The Society needs to describe this context and explore this aspect of the buildings’ history more thoroughly.

The barracks have been referred to as the "machine gun" barracks. For what period did they serve this function? How was this important or not? Is there a context related to this?

There are significant gaps in our knowledge of who used the buildings, for what and when. The history of Ft. Snelling suggests that other historic contexts exist for which Buildings 17, 18, 22 and 30 could have an association. A thorough historical report would identify and substantively define these contexts and then evaluate the buildings against them. (See the Secretary's Standards and Guidelines for Identification and Evaluation and 36 CFR 800.4 Identification of historic properties.)

There is very little information provided about Building 22 and 30. The report and other documentation offer three different dates for Building 22: 1878, 1880, and 1888. What is the date of its construction? The Army undoubtedly used Buildings 22 and 30 in many ways over the years to fit its changing needs. These uses could tell us much about the building's significance and evolution of life at this part of the fort and the fort overall.

Buildings 17 and 18 are connected by a structure being referred to as the link. The report remarks that there is no record of building the link but indicates that it may have been built at the same time as the barracks or in 1927. More research is needed to find out when the Army built the link and why. And then it needs to be evaluated to determine whether it is a contributing feature. This is especially important as the Society is proposing to remove the link. Is it possible that the Army built it as a cold weather adaptation for Minnesota, a kind of an early walkway or skyway?

As it does for Buildings 17 and 18, the report discounts the importance of the link and infill structures. It acknowledges that they were built during the era of significance, but then says, "Not all alterations made during a period of significance are significant, though, especially if they do not exhibit the same quality of design and construction. With a limited budget, restoring the building's front porches seems a better investment than retaining later alterations." This analysis in no way meets the Secretary's Standards. The Society has presented no evaluation of the quality of design or construction for these structures.

The design of the infill and link appear to match or blend well with the barracks buildings, so the architects obviously thought about the design. A record of what they were thinking could help determine something about the architectural aspects of the additions. And, the Society has to consider more than architecture. It has to evaluate the additions under Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and B (associated with the lives of significant persons in or past). Once the Society has done this, then we can consider the effects of removing them.

The report proposes that we have to make a choice between putting on the porches and repairing the infills and/or link. If the link and infill additions prove to be significant additions in their own right, then the Society should consider ways to restore them along with the original barracks.

The Society has provided no substantive evaluation of the integrity of Buildings 17 and 18. These buildings have been used for many purposes over the years. Did the different uses lead to significant changes to their interiors? Is the integrity their interiors still intact? This is important to know when evaluating the impacts of adaptively using the buildings. We need a substantive assessment of the interior integrity of Buildings 17 and 18.

The Secretary of the Interior's Standards for Identification, Standard I, states that "Careful selection of methods, techniques and level of detail is necessary so that the gathered information will provide a sound basis for making decisions." We simply do not have enough information to base a sound decision upon.

### **Adaptive Reuse**

The National Park Service and the Mississippi National River and Recreation Area emphasize the preservation of historic sites through adaptive use. As we have stated before, the MNRRA Comprehensive Management Plan says that we will be a model of adaptive use. Therefore, as we consider a change to the PPU, we need to know if using one of the historic buildings is feasible and prudent.

We were hoping the Society would provide detailed information on its consideration of Building 18 as a visitor center. However, the documentation is negligible. The Society asserts that it would cost four million dollars more to use Building 18 than to build a new building. This may be so, but the Society provides no detailed cost estimate for using Building 18. Also, the scenario provided does not look at putting the whole visitor center into Building 18, but instead calls for major elements being placed outside the building. The Society has provided no costs for the external features.

To take a real look at adaptive use, we need to have an alternative that looks at putting the whole visitor center into Building 17 and/or 18. The Society should invite the interested parties into the consideration of how to use one of the historic buildings for the visitor center. A sound assessment of the interior integrity of each building is essential for this.

The Society presents a variety of reasons for why Building 18 would not work, but explores none of them in the documentation.

Flexibility and State of the Art. We understand the Society's need for flexibility and the desire to have state of the art exhibits. However, these needs must take second place to the historic character at National Historic Landmarks. Through a thorough discussion with the consulting parties, we may find a way to meet the Society's needs and minimize the impacts to the NHL. The Society cites the demands of modern museum standards as a justification for its position, but were those standards written for National Historic Landmarks?



Room height. The Society insists it needs adequate room height. We can understand this need. However, the interested parties should have an opportunity to explore with the Society how the existing room height might be made to work or how the inside of Building 17 or 18 could be reconfigured to accommodate the height desired.

Floor support. The Society is rightly concerned about the load the floors could bear. For the areas that need support, it seems extra support could be placed in the building's basement. And, given that the exhibit space is only 3,000 square feet, it seems the size and weight of exhibit specimens would be limited.

Circulation. The Society points out that visitors need to circulate freely through the exhibit space and reception area. Again, through consultation, the interested parties may be able to suggest ways that traffic could flow through Building 17 or 18 to fit this need.

Black box type of space. For movies the Society says it needs a black box type of space. This issue is tied to ceiling height and a need for open spaces. This issue also deserves input from the interested parties.

Entrance. The Society wants a grand entrance for their new visitor center. How could the existing entrances be adapted to provide a welcoming and historic sense of place and arrival?

Columns. The Society says it cannot disturb the column arrangement in Building 18 because it would violate the Secretary's Standards. However, the Society has not presented an evaluation of the building's interior that shows how it was used over the era of significance. At times the barracks were used as barracks and at other times for other purposes that required significant changes. Building 17, for example, has an elevator in it. There may have been spaces within the barracks that were sectioned off from the general sleeping and living quarters during the cavalry period and during other periods. There may be areas within Building 17 or 18 that could be changed with minimal disruption to the column arrangement. In other words, the qualities that define the interior of the barracks need to be defined so we can clearly understand the potential effects.

In an early review, the NPS raised concerns about the potential impacts of making major changes to the interior of one or both of the barracks buildings. These were preliminary. The NPS has repeatedly stated that a more thorough assessment of effect needs to be done and with a more detailed plan. Also, the Society, in consultation, needs to weigh the impacts to the interior of one building against the impacts to the overall site.

## **Landscape Plan**

The Society does not present a written description of its site plan or its landscape plan for the proposed project, including the rationale for them. We mention a site plan here because we are not clear what of the overall site plan is included in the landscape plan. Please clarify this. With



the current documentation, the reviewers are expected to search through the drawings to get an idea of how the grounds will look once the project is completed. This is not enough. We need a written narrative. The report says the landscape plan will be worked out through a Programmatic Agreement. We may be able to resolve some issues through a Programmatic Agreement, but we need to know that we have identified as many of those issues as possible now.

### **Artist's Concept**

The Society has yet to provide an artistic rendering of what the building would look like. This is usually one of the first things produced by a developer to get people interested in their project. We are surprised there is not one for this building. The Society needs to provide an artistic rendering of what the new visitor center would look like so that the NPS and public can better evaluate the impact of the new visitor center on the NHL.