

MINNESOTA HISTORICAL SOCIETY State Historic Preservation Office

October 26, 2007

Mr. Paul Labovitz Superintendent National Park Service MNRRA 111 E. Kellogg Blvd., Suite 105 St. Paul, MN 55101-1256

Re:

Program of Preservation and Utilization (PPU) revision Historic Fort Snelling Visitor Center & Revitalization Project Fort Snelling, Hennepin County

SHPO Number: 2007-1798

Dear Mr. Labovitz:

Thank you for your letter of 11 October 2007 with regard to the above referenced project.

As you know, your agency initiated Section 106 review of this project with our office on 14 May 2007, and we provided initial comments on the project on 4 June 2007.

We have reviewed the "Documentation for Consultation" (30 August 2007), prepared by the Minnesota Historical Society, as well as subsequent National Park Service comments on the project and the public responses submitted pursuant to the 11 September 2007 open house. At this time, we have the following comments:

- 1. The issue of the location of the visitor center needs to be determined within the context of the NPS/MHS revision to the Program of Preservation and Utilization. Several alternatives for the center location are discussed in the materials that were submitted. On the one hand, reuse of one or more of the historic buildings as the visitor center could be the most sustainable overall preservation strategy in the long run, as it would re-use historic space without adding the additional long-term maintenance obligations of a new building. On the other hand, construction of a new visitor facility, with appropriate design and placement, along with rehabilitation of the four historic buildings and implementation of a strategy for their reuse, could also meet the Secretary of the Interior's Standards. This determination needs to be made to serve as a basis for the Section 106 Programmatic Agreement.
- 2. The materials submitted include a preliminary strategy for archaeological survey of the project area. This strategy appropriately includes six "areas of interest" which may be impacted by construction and which merit archaeological investigation. We would recommend that other "areas of interest" also be investigated if they include potential historic features that could relate to the interpretive program or to aspects of the overall site/landscape design. (The latter would include the two bridge abutments and the series of stone walls on the face of the bluff running upstream from the walled fort.) We note that many of the archeological features at Ft. Snelling may be important for associative values, not just as sources of scientific and cultural data, as currently indicated in the discussion of Area of Potential Effect (APE). Finally, the overall archaeological survey strategy needs to include a substantial component devoted to the analysis and interpretation of the artifacts that have been obtained in excavations at the fort during its restoration beginning in the 1950s. Without this perspective, it is impossible to adequately analyze and interpret findings from new surveys. To ensure a coherent approach, we strongly recommend that one principal investigator serve throughout the effort.

- 3. The materials submitted identify two historic properties in the APE for standing structures which merit additional evaluation Hidden Falls Park, and a section of Mississippi River Boulevard. We agree that the project has potential visual effects on these properties, but since the effects are quite generalized as viewed from the opposite side of the river, the evaluations may not need to address a great degree of detail on each of the properties. We would like to discuss with you an appropriate level of effort for these evaluations.
- 4. We concur that additional research needs to be completed to document the purpose of the three 1930s additions to Buildings 17 and 18. This will guide the discussion on appropriate treatment of these sections of the buildings.
- 5. We also find that additional information is needed on the 1960s/1970s reconstruction/restoration of the Long Barracks and the Officer's Quarters in the walled fort, before any strategy for rehabilitation/reprogramming for these buildings can be assessed. It is our understanding that the Long Barracks were essentially reconstructed, and that the Officer's Quarters were essentially restored with some reconstruction for missing elements. Any plans of the 1960s/1970s work, including documentation of existing historic fabric, would be helpful.
- 6. The submitted site/landscape schematic plan incorporates references to several historic elements, and helps to restore the overall coherence of the site. However, the accompanying narrative focuses largely on the proposed uses of the site, without providing an analysis of the historic landscape features and patterns to serve as a reference. As the schematic plan is further developed, these historic landscape features (surviving and vanished) should be articulated, within the categories of spatial organization, topography, vegetation, circulation, water features, and structures/furnishings/objects. It will be helpful to continue to integrate surviving historic elements of the landscape into the overall rehabilitation plan to anchor the rehabilitated landscape approach in the authentic. Incorporation of archaeological features could help accomplish this; other surviving historic elements could serve as well. Finally, the overall site plan needs to include necessary accommodations to enable a range of potential new uses for the four historic buildings on the project site, including provisions for adequate parking.

We look forward to working with you, the Minnesota Historical Society Historic Sites Division, the Advisory Council, and the other consulting/interested parties in continuing the review of this proposal, and in completing a Programmatic Agreement to address the above concerns. This project and the other efforts at developing and implementing a feasible preservation strategy for the Upper Bluff are important in assuring a better future for an endangered National Historic Landmark. Contact us at 651-259-3456 with questions or concerns.

Sincerely,

Britta L. Bloomberg

Deputy State Historic Preservation Officer

Shoraberg

CC:

Michael Fox, MHS
Tom Pfannenstiel, MHS
Heather Koop, MHS
John Anfinson, NPS
Dena Sanford, NPS
John Eddins, ACHP
Charlene Roise, Hess Roise
Joan Sorrano, HGA
Pat Emerson, MHS