



## 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

IN REPLY REFER TO:

H3017(MISS-FSVC)

September 20, 2007

Michael Fox  
Deputy Director of Programs  
Minnesota Historical Society  
345 Kellogg Blvd West  
St. Paul, MN 55102-1906

Dear Mr. Fox:

Now that the public meeting is over and we have received a written report on the Minnesota Historical Society's project proposal for its Fort Snelling properties, we think it is a good time to consider the process to date and where we might go. Our central concern is that the public was not involved in the discussions and decisions leading up to the project presented at the public meeting, and the National Park Service (NPS) had a very limited role. This made it especially important that the report provide enough detail for the NPS and the public to evaluate how the MHS arrived at its current proposal. The report does not do so, and we only received it on September 4. We will be submitting comments on the report by October 12 that detail our concerns and make suggestions for additional documentation and consultation.

Section 800.1 of the Advisory Council on Historic Preservation's regulations (36 CFR Part 800) states that, "The agency official shall ensure that the section 106 process is initiated early in the undertaking's planning, so that a broad range of alternatives may be considered during the planning process for the undertaking." As the agency official, I cannot say that we or the public have had the opportunity to consider a broad range of alternatives.

As you know, we especially need to demonstrate that the process has been open and thorough, given that the Society's property is part of the Fort Snelling National Historic Landmark. As Section 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.

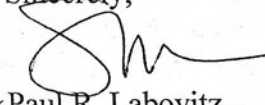
Such planning and actions require that the NPS and the public be involved in discussions regarding the project as early as possible. We can either go back and meet with the public regarding each step of the project, or MHS can provide enough information for a thorough public review.

The Society completed its analysis of the existing building, the reuse of Buildings 17 and 18, and the location and design of the proposed building with no public input and little from the NPS. We understand that you did an extensive internal review of each issue, but this is not presented in the report.

Considering the above, we believe the process has moved too fast, with too little information, and too little involvement from the NPS and the public. Also, the Advisory Council on Historic Preservation only received the Society written proposal in early September and has not had a chance to become involved in the project. Again, we believe their participation is necessary. These reasons make it impossible for us to complete a meaningful review of the project under Section 106 before the end of October. Again, the letter we send by October 12 will provide more detail on what we believe is needed to complete the review process.

If you have any questions concerning this letter, please call me at 651-290-3030, extension 222.

Sincerely,

  
for Paul R. Labovitz  
Superintendent

cc:

Regional Director, MWRO  
Britta Bloomberg, Deputy State Historic Preservation Office  
John Eddins, Advisory Council on Historic Preservation