

AGENDA
CITY OF MAPLEWOOD HERITAGE PRESERVATION COMMISSION
Thursday, December 8, 2022
7:00PM

City Council Chambers, Maplewood City Hall

A. ROLL CALL

B. APPROVAL OF AGENDA

C. APPROVAL OF MINUTES

1. November, 2022

D. NEW BUSINESS

1. Review of founding documents
2. 106 Review for Purple Line Project
3. Update on Ramsey County Poor Farm Water Tower

E. UNFINISHED BUSINESS

1. Demo application (TBD)
2. New board member recruitment update (Replacing J. DeMoe)

F. VISITOR PRESENTATIONS

1. Maplewood Area Historical Society Update

G. ADJOURNMENT

RULES OF CIVILITY FOR THE CITY COUNCIL, BOARDS, COMMISSIONS AND OUR COMMUNITY

Following are rules of civility the City of Maplewood expects of everyone appearing at Commission Meetings - elected officials, staff and citizens. It is hoped that by following these simple rules, everyone's opinions can be heard and understood in a reasonable manner. We appreciate the fact that when appearing at Commission meetings, it is understood that everyone will follow these principles:

- Speak only for yourself, not for other Commission members or citizens - unless specifically tasked by your colleagues to speak for the group or for citizens in the form of a petition.
- Show respect during comments and/or discussions, listen actively and do not interrupt or talk amongst each other.
- Be respectful of the process, keeping order and decorum. Do not be critical of Commission members, staff or others in public.
- Be respectful of each other's time keeping remarks brief, to the point and non-repetitive.]

MINUTES

CITY OF MAPLEWOOD HERITAGE PRESERVATION COMMISSION Thursday, November 13, 2022 7:00PM

City Council Chambers, Maplewood City Hall

A. ROLL CALL

Chair Bob Cardinal	Present
Vice Chair Richard Currie	Present
Commissioner John Gaspar	Present
Commissioner David Hughes	Present
Commissioner Barbara Kearn	Present
Commissioner Laura Koski	Present
Councilmember Villavicencio	Absent
Staff: Joe Sheeran, Comms Mgr	Present

B. APPROVAL OF AGENDA

- Motion J. Gaspar; 2nd Kearn; approve voice vote without objection

C. APPROVAL OF MINUTES

1. October, 2022
 - Motion J. Kearn; 2nd Hughes; approve voice vote without objection

D. NEW BUSINESS

1. Swearing in and introduction of new Commission member Laura Koski
2. Update on Ramsey County Poor Farm Water Tower
3. Maplewood Local Designation Nominations
4. Nominations for heritage Award

E. UNFINISHED BUSINESS

1. Demo application (TBD)
2. Update on St. Jerome's Local Designation
3. New board member recruitment update (Replacing J. DeMoe)

F. VISITORPRESENTATIONS

1. Maplewood Area Historical Society Update

G. ADJOURNMENT

- Currie motions to adjourn.

]

Sec. 2-301. - Authority for establishment.

There is hereby established for the city a heritage preservation commission as an independent commission to the city council, as provided in Minn. Stats. §§ 471.193 and 138.51.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-87), 7-11-2011)

Sec. 2-302. - Statement of public policy and purpose.

The city council hereby declares as a matter of public policy that the protection, preservation, perpetuation and use of places, areas, buildings, structures and other objects having a special historical, community or aesthetic interest or value is a public necessity and is required in the interest of the people. The purpose of this division is to:

- (1) Safeguard the cultural resources of the city by preserving sites, structures, districts and landmarks which reflect elements of the city's cultural, social, economic, political or architectural history;
- (2) Protect and enhance the city's attractions to residents and visitors;
- (3) Foster civic pride in the beauty and notable achievements of the past;
- (4) Enhance the visual and aesthetic character, diversity and interest of the city; and
- (5) Promote the use and preservation of historic sites and landmarks for the education and general welfare of the people of the city.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-88), 7-11-2011)

Sec. 2-303. - Advisory body.

All actions of the commission shall be in the nature of recommendations to the city council, and said commission shall have no final authority with reference to any matters, except as the council may lawfully delegate authority to it.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-89), 7-11-2011)

Sec. 2-304. - Composition; appointment; qualifications; terms.

- (a) The heritage preservation commission shall be composed of seven members appointed by the city council, who shall be residents of the city, and shall be selected to assure that the commission is representative of the various areas of the city and responsive to the needs of the people.
- (b) Commission membership shall be drawn from persons with demonstrated interest and/or expertise in historic preservation. If available in the community, at least two members of the commission shall be heritage preservation-related professionals (e.g., the professions of history, architecture, architectural history, archeology, planning, real estate, design, building trades, landscape architecture, or law). A member of the Maplewood Heritage Preservation Commission is required to be a representative to the Ramsey County Historical Society. The city shall pay for the membership of the commission or designee.
- (c) The members of the heritage preservation commission shall serve staggered terms. All appointments shall be assigned by the city council for a term of three years.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-90), 7-11-2011)

Sec. 2-305. - Officers; generally.

The chairperson and vice-chairperson of the commission shall be elected by the commission at the first meeting in May of each year from among the members of the commission. The chairperson shall be responsible for calling and presiding over all meetings and shall be entitled to an equal vote with other members of the commission. If the chairperson is unable to attend a meeting, the vice-chairperson shall conduct the meeting.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-91), 7-11-2011)

Sec. 2-306. - Designation of historic sites and landmarks.

- (a) *Procedures.* The city council, upon the request of the commission, may by resolution designate an historic site, landmark, or district. Prior to such designation, the city council shall hold a public hearing, notice of which shall be published at least ten days prior to the date of the hearing. Notice of the hearing shall also be mailed to all owners of property which is proposed to be designated as an historic site, landmark or district and to all property owners within 500 feet of the boundary of the area to be designated. Every nomination shall be forwarded to the Minnesota Historical Society for review and comment within 60 days of the commission's request.
- (b) *Eligibility criteria.* In considering the designation of any area, site, place, district, building or structure in the city as an historic site, landmark, or district, the commission shall consider the following factors with respect to eligibility:
 - (1) Its character, interest or value as part of the history or cultural heritage of the city, the state or the United States;
 - (2) Its association with persons or events that have made a significant contribution to the cultural heritage of the city;
 - (3) Its potential to yield information important in history or prehistory;
 - (4) Its embodiment of distinguishing characteristics of architectural type or style, or elements of design, detail materials or craftsmanship; and
 - (5) Its unique location or singular physical appearance representing an established or familiar visual feature of a neighborhood or community of the city.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-92), 7-11-2011)

Sec. 2-307. - Alterations to landmarks, sites or districts; review.

- (a) *Review and recommendations generally.* The commission shall review and make recommendations to the council concerning proposed alterations to an historic site, landmark or district.
- (b) *Land use permit.* Every application for a land use permit which may result in the alteration of a designated historic site, landmark or district in the city shall be reviewed by the commission; thereafter, the commission shall make a recommendation and may recommend conditions regarding approval to the city council concerning the proposed permit.
- (c) *Other building permits.* The commission shall review and make recommendations to the council concerning the issuance of building permits to do any of the following in a historic district or state designated historic site:
 - (1) New construction - New building or new addition to an existing building.
 - (2) Remodel - Alter, change or modify building or site.
 - (3) Move a building - Building or structure moved into the city.

- (4) Excavation - Dig out materials from the ground.
- (5) Demolition - Destroy, remove or raze - completely tear down.
- (d) *Factors considered.* The commission, upon receipt of the permit application and plans, shall determine if the work to be performed adversely affects the designated historic site, landmark or district. In determining whether or not there is an adverse effect to the historic site, landmark, or district the commission shall consider the following factors:
 - (1) Whether the work will significantly alter the appearance of the building or structure so as to remove the features which distinguish the historic site, landmark or district as a significant cultural resource.
 - (2) Whether the use of the property will destroy, disturb or endanger a known or suspected archaeological feature site.
- (e) *Standards and guidelines.* The Secretary of the Interior's Standards for the Treatment of Historic Properties (listed below) shall be required basis for permit review decisions:
 - (1) The comprehensive plan adopted by the city shall be the authoritative guide to reviewing permits in relation to designated historic sites, landmarks and historic districts.
 - (2) A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
 - (3) The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
 - (4) Each property shall 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 architectural elements from other buildings, shall not be undertaken.
 - (5) Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
 - (6) Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.
 - (7) Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
 - (8) Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
 - (9) Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
 - (10) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
 - (11) New additions and adjacent or related new construction shall 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.
- (f) *Appeals.* Any party aggrieved by a decision of the commission shall within ten days of the commission's action recommending denying the issuance of a building permit within a historic district have a right to appeal such decision to the city council. The commission in recommending denial of a building permit shall advise the applicant of his/her right to appeal to the city council. The aggrieved

party shall file with the building official a written notice requesting council review of the action taken by the commission.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-93), 7-11-2011)

Sec. 2-308. - Maintenance of records and documents.

The commission shall conduct a continuing survey of cultural resources in the city which the commission has reason to believe are or will be eligible for designation as historic sites, landmarks or districts. The commission shall also prepare and maintain a comprehensive map and survey.

- (1) *Register of historic sites and landmarks.* The city shall maintain a register of historic sites and landmarks.
- (2) *Repository for documents.* The office of the building official is designated as the repository for all studies, surveys, reports, programs, and designations of historic sites and landmarks.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-94), 7-11-2011)

Sec. 2-309. - Violation.

It shall be a misdemeanor to alter, disturb, deface or materially change the appearance or use of a designated historic site, landmark, or district without a permit.

(Ord. No. 905, § 1, 6-28-2010; Ord. No. 905(Rev.), § 1(2-95), 7-11-2011)

Sec. 2-310. - Reserved.

4th District Facts

National Register Additions

- Roselawn Chapel and Administration Building
- ***Degree of Honor Protective Association Building, St. Paul, Ramsey County (image at right)***
- St. Paul Casket Company
- Woodland Park Baptist Church

State Tax Credit Projects Completed

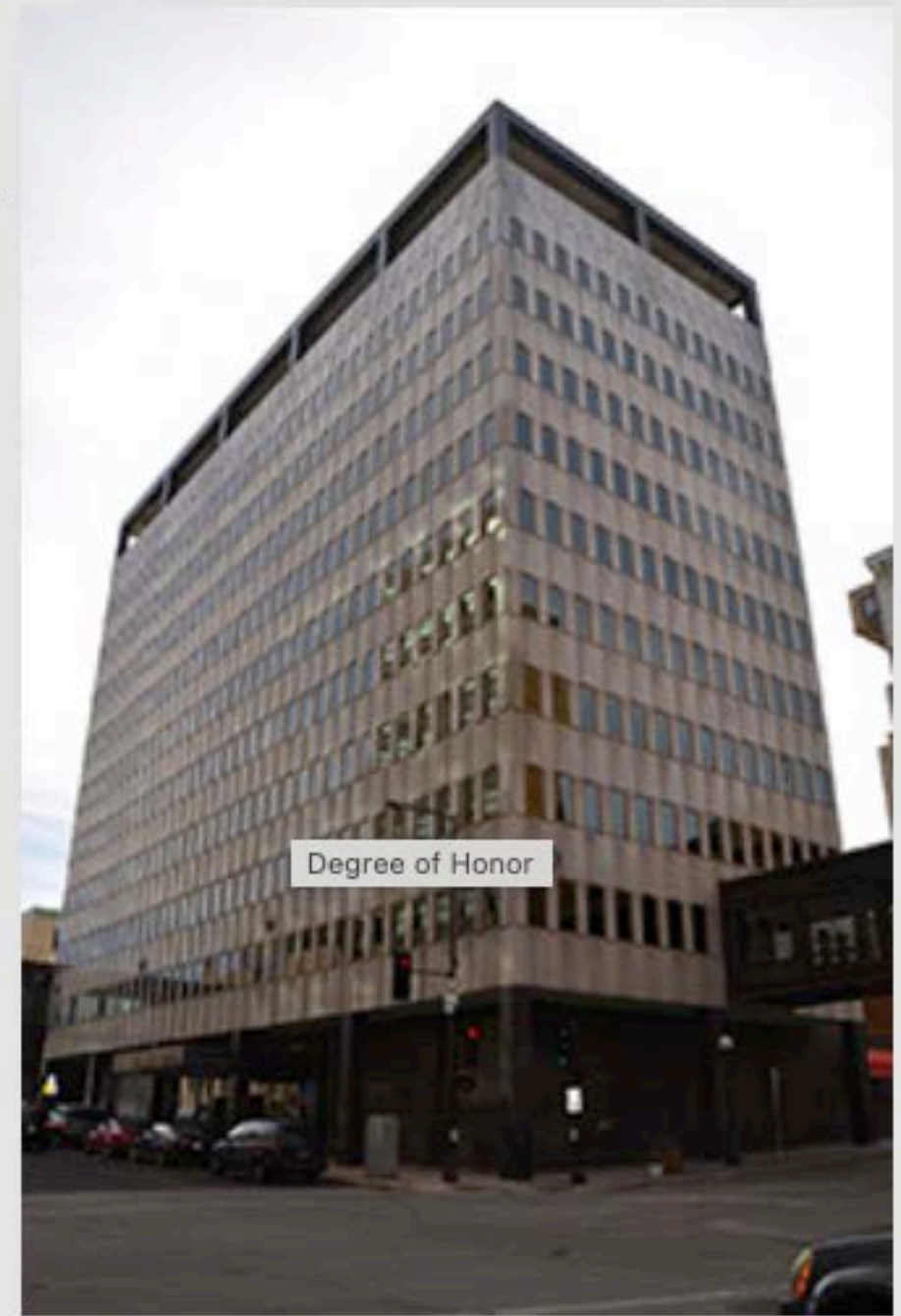
- Office and Well House, Schmidt Brewery
- Noyes Brothers & Cutler Building
- Degree of Honor Protective Association Building (image at right)
- Osborn Building

Certified Local Governments

- Afton
- Maplewood
- North St. Paul
- St. Paul
- Stillwater

Federal Reviews

- 254 Federal reviews completed



December 2, 2022

Sarah Beimers, Environmental Review Program Manager
Minnesota State Historic Preservation Office
Administration Building
50 Sherburne Avenue, #203
St. Paul, MN 55155-1402

RE: METRO Purple Line (formerly Rush Line) Bus Rapid Transit, Ramsey County, Minnesota; 30%
Plan Review, SHPO #2019-0958

Dear Ms. Beimers,

The Federal Transit Administration (FTA) is writing to continue consultation for the Purple (formerly Rush) Line Bus Rapid Transit (BRT) Project (Project). Under delegation from FTA and as per the terms of the Project's Memorandum of Agreement (MOA), Metropolitan Council's Preservation Lead staff meeting the Secretary of the Interior's Professional Qualification Standards (48 FR 44738-44739) reviewed project plans at the 30% design stage (per Stipulation VI.C.) in order to:

... recommend to FTA whether revisions are necessary to the Project's APE, whether any Project design changes may result in a change to FTA's finding of effect, whether the design requirements of Stipulation V have been met, and whether the plans incorporate commitments made to the Consulting Parties through consultation under Stipulations VI and XII.

The 30% plans do not extend north beyond Beam Avenue as the Project's northern terminus is being redesigned. In March 2022, the City of White Bear Lake passed a resolution asking that the project not enter White Bear Lake; therefore, the corridor design north of Beam Avenue to the end of the corridor has been excluded from the 30% Volume A submittal due to the ongoing Route Modification Study. With the final Corridor Management Committee direction anticipated in Quarter 1 of 2023, the design advancement of the remaining corridor will occur afterwards and will be submitted in a separate 30% Volume B submittal. The 30% plans for the area north of Beam Avenue are anticipated to be submitted at the same time as the 60% plans for the corridor south of Beam Avenue, currently expected to be in Quarter 2 of 2023. Consultation will occur with consulting parties between the 30% and 60% plan development north of Beam Avenue, once available, as required by the Project MOA.

The Preservations Lead's analysis, outlined in the attached report, is based on the Project's 30% Plans (Volume A) dated September 23, 2022.

30% Plan Review

The Preservation Lead has reviewed the Project's 30% plans and recommend the following.

- Most project changes between the 15% and 30% plans were within the same LODs at the 15% stage. There were several locations that extended beyond the LOD at the 15% plan stage; however, based on the project methodology as detailed in the 2020 archaeology report, all appear to have low potential for containing intact, significant archaeological sites due to previous residential, commercial, and/or railroad and roadway development. Therefore, no additional archaeological fieldwork is recommended.

- No change to the Project APE is recommended since all the changes and their potential to affect the character or use of historic properties, if any are present, are sufficiently accounted for in the previous APE boundaries.
- As per Stipulation VI.C, it is recommended that the proposed Johnson Parkway Bridge meets the SOI Standards and that commitment is completed, pending the receipt of consulting parties' comments and the consideration of such comments, as per Stipulations VI; and continued review by the Preservation Lead should occur to determine if design changes warrant reinitiating consultation.
- As per Stipulation VII, it is recommended that no Construction Protection Plans for Historic Properties (CPPHPs) are needed and that other means of notifying the contractor of the presence of historic properties can be used pending the receipt of consulting parties' comments and the consideration of such comments.
- While the finding of effect for the project has not changed, an additional project activity was identified that will add to the adverse effect to the LS&M Railroad Corridor Historic District. The planned replacement of the Bridge R0438 (McAfee Bridge) constitutes the loss of original historic fabric from the LS&M Railroad Corridor Historic District. FTA should consult with consulting parties per Stipulation XII on determining if additional mitigation will be required, or if the minimization efforts in other locations, namely the Arlington Bridge crossing, make the current mitigation commitment commensurate with the effects to the historic district overall. As per the terms of Stipulation XII, the new bridge should be designed in accordance with the SOI Standards to the extent possible to minimize additional effects.

Next Steps

FTA and Mead & Hunt will hold a consultation meeting with your office and the parties copied below in January 2023 (date to be determined). The purpose of this meeting is to review the 30% design review memo and answer any questions from consulting parties prior to your issuing written comments.

FTA requests that MnSHPO and the consulting parties copied below provide comments on the 30% design review for the proposed Project within 60 calendar days of receipt of this letter, which is January 31, 2022. If you have any questions, please contact William Wheeler at (312) 353-2639 and William.Wheeler@dot.gov. Thank you.

Sincerely,

Jay M. Ciavarella
Director, Office of Planning and Program Development

Enclosures: *Technical Memorandum: 30% Plan Review (November 2022)*

cc (via email): William Wheeler, Federal Transit Administration
Elizabeth Breiseth, Federal Transit Administration
Nancy Komulainen-Dillenburg, United States Army Corps of Engineers
Melissa Jenny, United States Army Corps of Engineers

Philip Forst, Federal Highway Administration
Joe Campbell, Federal Highway Administration
Lisa Elliott, Purple Line Project Office
Craig Lamothe, Purple Line Project Office
Melissa Lawrence, City of Gem Lake
Michael Martin, City of Maplewood
Maplewood Historical Society
Joe Sheeran, Maplewood Heritage Preservation Commission
Stephen Smith, Ramsey County
Bill Dermody, City of St. Paul
George Gause, St. Paul Heritage Preservation Commission
Nolan Wall, City of Vadnais Heights
Anne Kane, City of White Bear Lake
Sara Hanson, White Bear Lake Historical Society
Pat Christopherson, White Bear Lake Township



Technical Memorandum: 30% Plan Review

As required by the Section 106 Purple (Rush) Line Bus Rapid
Transit Project Memorandum of Agreement

To: William Wheeler and Jay Ciavarella, Federal Transit Administration Region 5

From: Kristen Zschomler, historian and RPA-Registered archaeologist;
Christina Slattery, historian; and
Valerie Reiss, historian;
Mead & Hunt, Inc. – Preservation Lead

11/29/2022

TABLE OF CONTENTS

List of Acronyms	iii
1. Introduction	4
2. Stipulation IV: FTA Review of Project Plans - Review of 30% Plans	5
2.1. Removed Design Elements	6
2.2. Overall Design Advancements/Changes	7
2.3. Station and Area-specific Design Changes	8
2.3.1. 14th Street Station	8
2.3.2. Mt. Airy Street Station	8
2.3.3. Olive Street Station	9
2.3.4. Cayuga Street Station	10
2.3.5. Payne Avenue Station	11
2.3.6. Arcade Street Station	11
2.3.7. Between the Arcade and Cook Avenue Stations	17
2.3.8. Cook Avenue Station	17
2.3.9. Between the Cook Avenue Station and Johnson Parkway Bridge	17
2.3.10. Johnson Parkway Bridge	18
2.3.11. Maryland Avenue Station	19
2.3.12. McAfee Bridge (Bridge R0438)	20
2.3.13. Arlington Avenue Area	21
2.3.14. Pedestrian Connection to Nebraska Avenue	22
2.3.15. Larpenteur and Frost Avenue Stations	22
2.3.16. Gateway Overpass	22
2.3.17. Trail Adjustment near Weaver Elementary School	23
2.3.18. Highway 36 Station	24
2.3.19. Harvest Park Area	24
2.3.20. Between County Road C and Beam Avenue	25
3. Stipulation V: Design Requirements	26
3.1. Stipulation V.A.ii: Trail Design in Phalen Park and Johnson Parkway	26
3.2. Other Stipulation V.A. Design Reviews	26
4. Stipulation VI: Consulting Party Review of Certain Project Elements under the SOI Standards	27
4.1. Stipulation VI.A.i: Cayuga Street Station Area	27

4.2. Stipulation VI.A.ii: Barriers at Forest Street Bridge.....	27
4.3. Stipulation VI.A.iii: Johnson Parkway Bridge Area	27
4.4. Stipulation VI.A.iv: Weaver Trail Underpass Area	37
4.5. Stipulation VI.A.v: Dedicated Guideway and Fitch/Barclay Trail Underpass	37
5. Stipulation VII: Construction Protection Plan for Historic Properties (CPPHP)	38
6. Stipulation VIII: Mitigation for Adverse Effects to the LS&M Railroad Corridor Historic District	39
7. Stipulation IX: Changes to the Area of Potential Effects (APE)	40
8. Section X: Additional Survey and Evaluation	41
9. Stipulation XI: Additional Assessment of Effects and Stipulation XII: Consultation to Resolve Additional Adverse Effects	42
9.1. StPS&TF/Omaha Road Railroad Corridor Historic District	42
9.2. LS&M Railroad Corridor Historic District	42
10. Recommendations	44

FIGURES

Figure 1. Boundary of StPS&TF/Omaha Road Railroad Corridor Historic District in blue near the Arcade Street Ramp.	12
Figure 2. Arcade Street Station alternative options.	13
Figure 3. Arcade Street Station Alternative Option A.	14
Figure 4. Arcade Street Station Alternative Option B.	15
Figure 5. Arcade Street Station Alternative Option C.	16
Figure 6. Proposed design for the Weaver Trail Underpass.	23
Figure 7. Plan view of proposed Purple Line BRT Bridge over Johnson Parkway.	30
Figure 8. Earl Street Bridge over Phalen Boulevard, which is the precedent design for the proposed Purple Line Bridge over Johnson Parkway.	31
Figure 9. Earl Street Bridge over Phalen Boulevard, which is the precedent design for the proposed Purple Line Bridge over Johnson Parkway.	32
Figure 10. 1940 (left) and 2020 (right) aerial photographs of the northern segment of Johnson Parkway. Note the removal of the railroad and replacement with Phalen Parkway in the southwest quadrant (solid yellow line), removal of the triangle interchange and replacement with a four-way intersection (yellow circles), and alteration of the eastern arm of the parkway (yellow dashed line showing previous roadway versus solid yellow line representing the roadway today).	33
Figure 11. Detail of Johnson Parkway, 1940 (top) and 2020 (bottom). Note the trees lining the railroad corridor (yellow dashed line) and the original railroad bridge crossing (yellow arrow) in the 1940 aerial. Based on a review of historic aerals, by 1991, all original vegetation along Johnson Parkway was removed and by 2008, all the trees along the railroad corridor were removed. The planted line of trees (see yellow arrow) first appears in the 2011 aerial.	34

LIST OF ACRONYMS

ADA	Americans with Disabilities Act
APE	Area of Potential Effects
BMP	Best Management Practices
BRT	Bus Rapid Transit
CPPHP	Construction Protection Plan for Historic Properties
Corps	United States Army Corps of Engineers
Council	Metropolitan Council
DART	Design Area and Refinement Team
EA	Environmental Assessment
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
LOD	Limits of Disturbance
LS&M	Lake Superior & Mississippi Railroad
MnDOT	Minnesota Department of Transportation
MnDOT CRU	Minnesota Department of Transportation Cultural Resources Unit
MOA	Memorandum of Agreement
National Register	National Register of Historic Places
PA	Programmatic Agreement
PLPO	Purple Line Project Office
Project	Purple Line Bus Rapid Transit Project
RCRRA	Ramsey County Regional Rail Authority
ROW	Right-of-way
Section 106	Section 106 of the National Historic Preservation Act of 1966, as amended
SHPO	State Historic Preservation Office
SOI Standards	Secretary of the Interior's Standards
StPS&TF	Saint Paul, Stillwater & Taylors Falls Railroad

1. INTRODUCTION

This memorandum has been prepared based on the requirements of the Purple Line Bus Rapid Transit (BRT) Project (Project) Memorandum of Agreement (MOA), signed by the Federal Transit Administration (FTA), Minnesota State Historic Preservation Office (SHPO), Federal Highway Administration (FHWA), United States Army Corps of Engineers (Corps), and Metropolitan Council (Council). The MOA codifies the steps by which Section 106 of the National Historic Preservation Act of 1966, as amended (Section 106) review for the Project is to be completed as Project plans are developed by the Purple Line Project Office (PLPO).

The Project's Section 106 finding of effects to historic properties (i.e., those eligible for or listed in the National Register of Historic Places (National Register) as defined at 36 CFR § 800.16(l)(1)) was based on the 15% Project plans, resulting in a finding of Adverse Effect to the Lake Superior & Mississippi (LS&M) Railroad Corridor Historic District: Saint Paul to White Bear Lake (XX-RRD-NPR001), herein referred to as the LS&M Railroad Corridor Historic District; three individually eligible 1868 Alignments of the LS&M (XX-RRD-NPR002, XX-RRD-NPR003, and XX-RRD-NPR004); and the LS&M Railroad Corridor Historic District: White Bear Lake to Hugo (XX-RRD-NPR005). In addition, conditions were placed on several historic properties to avoid or minimize effects to them: Lowertown Historic District (RA-SPC-4580); Saint Paul Union Depot (RA-SPC-5225 and RA-SPC-6907); Great Northern Railroad Corridor Historic District (RA-SPC-5918); Westminster Junction (RA-SPC-5618); Saint Paul, Stillwater & Taylors Falls (StPS&TF)/Omaha Road Railroad Corridor Historic District (XX-RRD-CNW001); Johnson Parkway (RA-SPC-8497 and RA-SPC-5685); Phalen Park (RA-SPC-10850); Moose Lodge 963 (RA-MWC-0134); and Madeline L. Weaver Elementary School (RA-MWC-0031).

This memo includes detailed documentation of required review elements based on the Project's 30% plan status, supported as per the requirements of Stipulation III: Deliverables and Consulting Party Review Procedures. See the Purple Line Quarterly Report No. 4 for Quarter 3 (July 1 – September 30, 2022) for other stipulation updates (distributed to consulting parties on November 28, 2022).

2. STIPULATION IV: FTA REVIEW OF PROJECT PLANS - REVIEW OF 30% PLANS

The MOA requires the Project's Preservation Lead to review project plans at the 30%, 60%, 90%, and 100% design stages, as well as any modifications made to the 100% plans (Stipulation VI.C.) in order to:

... recommend to FTA whether revisions are necessary to the Project's APE, whether any Project design changes may result in a change to FTA's finding of effect, whether the design requirements of Stipulation V have been met, and whether the plans incorporate commitments made to the Consulting Parties through consultation under Stipulations VI and XII.

Mead & Hunt, Inc. (Mead & Hunt), as Project Preservation Lead, reviewed the Project's 30% plans (attached) and compared them to the limits of disturbance (LOD) on the 15% plans, the archaeological study and survey areas, and the Project Area of Potential Effects (APE) (all previously distributed) to determine if there are changes between the 15% and 30% design that would result in the items listed above. Changes to LODs are described below and images from the archaeological survey limits are compared with the LOD at the 30% plan stage as shown on the Project Layout sheets (attached). For changes from the 15% LOD, the change is described and the 30% plan sheet number is provided in the text for reference and ease of finding, but no comparison image is provided. The results of this review are summarized here and documented below.

- There are minor changes to the proposed work within the 15% LODs and/or minor changes that extend beyond the 15% LOD. Where expanded LOD boundaries were noted, RPA-registered archaeologist Kristen Zschomler compared the area with the previously reviewed and approved archaeological methodology as documented in the 2020 report by Vicki L. Twinde-Javner of the Mississippi Valley Archaeology Center, *Phase IA Literature Review, Phase I Archaeological Investigations and Phase II Archaeological Investigations of 21RA82 for the Rush Line BRT Project, Ramsey County, Minnesota* (2020 archaeology report). Based on an application of the established and previously reviewed methodology in that report, no areas in the expanded LOD are recommended for further archaeological work, as documented below.
- No change to the Project APE is recommended since all the changes and their potential to affect the character or use of historic properties, if any are present, are sufficiently accounted for in the previous APE boundary. This includes the change from an at-grade to a grade-separated crossing at Arlington Avenue, as documented below.
- The commitment for the Johnson Parkway Bridge and project elements proximate to Madeline L. Weaver Elementary School to be designed in accordance with the Secretary of the Interior's Standards (SOI Standards) to the extent feasible as per Stipulation V has been met, pending consulting party comments under Stipulations VI and continued review by the Preservation Lead as plans advance.
- Recommendation that alternative methods to the use of Construction Protection Plans for Historic Properties (CPPHPs) be used.

- While the finding of effect for the project has not changed, an additional project activity was identified that will add to the adverse effect to the LS&M Railroad Corridor Historic District through the removal and replacement of Bridge R0438 (former railroad bridge now pedestrian path connecting McAfee Street to East Shore Drive [RA-SPC-11140]), a contributing element. Other effects to the historic district have been minimized, mainly through the reduction of railroad bed removal at the Arlington Avenue crossing.

2.1. Removed Design Elements

- The 30% plans do not extend beyond Beam Avenue as the Project's northern termini is being redesigned. In March 2022, the City of White Bear Lake passed a resolution asking that the project not enter White Bear Lake; therefore, the corridor design north of Beam Avenue to the end of the corridor has been excluded from the 30% Volume A submittal due to the ongoing Route Modification Study. With the final Corridor Management Committee direction anticipated in Quarter 1 of 2023, the design advancement of the remaining corridor will occur afterwards and will be submitted in a separate 30% Volume B submittal. The 30% plans for the area north of Beam Avenue are anticipated to be submitted at the same time as the 60% plans for the corridor south of Beam Avenue, currently expected to be in Quarter 2 of 2023. Consultation will occur with consulting parties between the 30% and 60% plan development north of Beam Avenue, once available, as required by the Project MOA.
- Robert Street – reduction of the turn radius from 6th Street to northbound Robert Street.
- Fourteen retaining walls were removed from the project by refining grades of stations, bridges, and trails.
 - RTW-202 – Johnson Parkway Bridge Approach
 - RTW-206 – Maryland Avenue Station
 - RTW-211 – Maryland Avenue Station
 - RTW-236 – Gateway Trail Overpass Approach
 - RTW-237 – Gateway Trail Overpass Approach
 - RTW-240 – Weaver Elementary Area
 - RTW-241 – Changed to bridge wing walls over Weaver Trail
 - RTW-242 – Changed to bridge wing walls over Weaver Trail
 - RTW-243 – Changed to bridge wing walls over Weaver Trail
 - RTW-244 – Changed to bridge wing walls over Weaver Trail
 - RTW-257 – Bridge Over Highway 36

- RTW-280 – Trail south of Beam Avenue
- RTW-282 – Trail south of Beam Avenue
- RTW-284 – Trail south of Beam Avenue

2.2. Overall Design Advancements/Changes

Overall advancement of elements included roadway alignments, profiles, grading limits, BMP locations (best management practice water management systems), traffic signal design, maintenance vehicle pull-offs, and right-of-way (ROW). Significant advancement of grading design occurred, including steepening of side slopes where appropriate. None of the proposed changes require a change to the Project APE and no further survey work is recommended.

- Architecture
 - Typical platform plans are included in the 30% plans. Architecture plans for Maplewood Mall Transit Center and station platforms/shelters will be included in the 60% submittal. Fencing is shown in the construction plans. Further proposed landscape/urban design elements will be shown in the 60% plans.
- Civil
 - Civil notes, typical sections, and construction plan and profile sheets are included in the 30% submittal that show proposed guideway, roadway, trail, sidewalk, platforms, and alignment and profile geometry. The 60% plans will include civil details, alignment plans and tabulations, paving and jointing, superelevation, intersection details, grading, and cross sections.
- Drainage
 - Stormwater BMP locations are shown in the 30% construction plans. Drainage plans showing proposed storm structures and pipes will be included in the 60% plans.
- Lighting
 - Proposed light pole locations are shown in the 30% construction plans. Lighting plans will be included in the 60% submittal.
- Signing and striping
 - Signing and striping is not included in the 30% submittal. The construction plans include traffic directional arrows, and the traffic signal plans show proposed striping at signalized intersections. Signing and striping plans will be included in the 60% submittal.
- Soil erosion and sediment control
 - Soil erosion and sediment control plans will be part of the 90% submittal.

- **Structural**
 - Bridge plans are included at the end of the 30% plan set for reference. Preliminary bridge plans were submitted separately to MnDOT for review. A retaining walls table is included in the 30% plans and retaining wall locations are shown in the construction plans.
- **Systems**
 - Fiber network overview, block diagrams, and select details have been included in the 30% plans. More detailed systems plans that include further systemwide details, station communications details, and proposed conduits will be included in the 60% submittal.
- **Traffic signals**
 - Traffic signal plans are included in the 30% submittal that show proposed signal system layouts. Further detail will be included in the 60% plans.
- **Utilities**
 - The 30% plans include existing utility plans. Proposed utilities will be shown in the 60% plans.

2.3. Station and Area-specific Design Changes

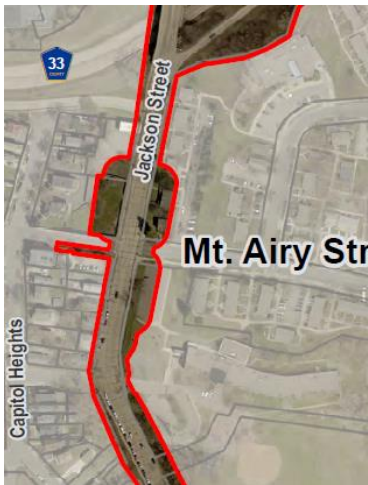
2.3.1. 14th Street Station

The 30% plans include sidewalk improvements of 6-8 feet wider than shown in the 15% plans. The 30% plans show a walk-behind platform, curb and sidewalk replacement for the entire block, removal of parking spaces in adjacent lot, and new sidewalks (Plan Sheet 79). The wider LOD was included in the archaeology study area; therefore, no additional archaeological work is recommended.

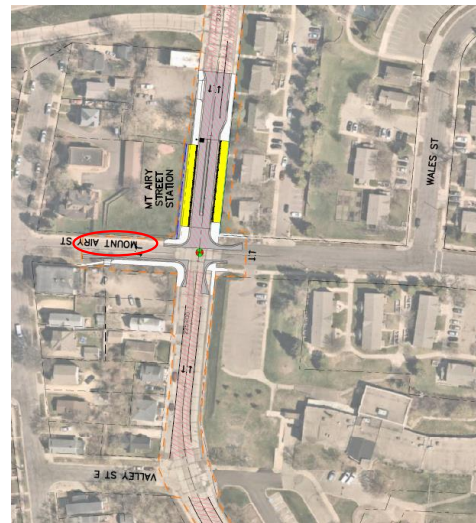
2.3.2. Mt. Airy Street Station

A raised median was incorporated between platforms to prevent vehicles from passing buses stopped at BRT platforms. This treatment is like the proposed treatment on B Line and the decision was made through the Design Area and Refinement Team (DART). Bicycle lanes and the retaining pond seen in the 15% plans have been removed. The limits of existing roadway reconstruction were extended to the north (Plan Sheet 82). There is a small area not previously included in the archaeological study area boundaries for new sidewalks (see red circle on layout sheet below); however, the area is located within areas of previous disturbance from roadway and residential development. According to the 2020 archaeology report, the area at the proposed Mt. Airy Street Station “will generally use existing roadway and work is expected to be within the road ROW; station area heavily disturbed, ROW heavily disturbed; no survey recommended (page 76).” Therefore, the expanded LOD are unlikely to contain intact, significant archaeological deposits and no additional fieldwork is recommended.

Archaeology study area map, page 2



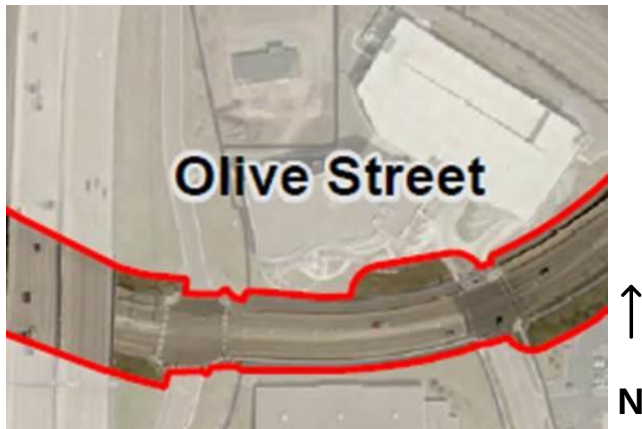
Project Layout Sheet 6



2.3.3. Olive Street Station

The southbound station platform was shifted approximately 30 feet further south. The City of Saint Paul requested the platform be shifted to allow for the trail crossing of Health Partners Drive to mimic what exists today. In addition, wider pedestrian ramps were included, construction limits on the south side of Phalen Boulevard were extended to the back of the parking lot curb, and a maintenance vehicle pull-off pad was added (Plan Sheets 86-87). There is a very small area not previously included in the archaeological study area boundaries (see red circle on layout sheet below). The 2020 archaeology report stated that along Phalen Boulevard the Project “will generally use existing roadway to Arcade, then RCRRA ROW to Johnson Parkway; station area heavily disturbed, ROW heavily disturbed; no survey recommended (page 77).” The small additional area within the 30% LOD is located within areas of previous disturbance from roadway and residential development. It is unlikely to contain intact, significant archaeological deposits and no additional archaeological fieldwork is recommended.

Archaeology study area map, page 3



Project Layout Sheet 8

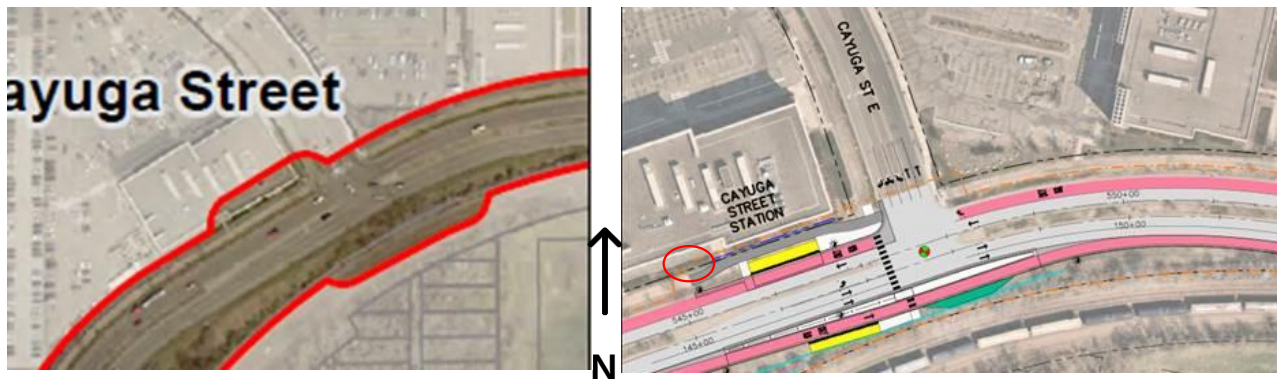


2.3.4. Cayuga Street Station

The northbound station was changed from a far side condition to a near side condition. The City of Saint Paul requested this change to eliminate a long second crosswalk on the east side of Cayuga Street and Phalen Boulevard. The City was concerned the signal timing required for pedestrians would significantly impact the existing traffic volumes. The decision was made through the DART. The southbound station shifted farther away from the intersection to allow crosswalks to work as they do today. In addition, retaining wall limits were refined and a maintenance vehicle pull-off was added (Plan Sheets 89-90). There is a small area not previously included in the archaeological study area boundaries (see red circle on layout sheet below). According to the 2020 archaeology report “station areas heavily disturbed; area along Payne Avenue heavily disturbed. Visual reconnaissance indicates locations of nine former railroad buildings at Cayuga Street; East St. Paul Station; E. St. Paul Roundhouse; and CStPM&O Roundhouse have been heavily disturbed by construction of Payne Avenue, modern buildings and installation of utilities. Low potential for intact deposits. No reconsideration per the Supplement to the [National Register Multiple Property Documentation Form] for Railroads in Minnesota, 1861-1956 (draft) warranted (Page 77).” The small additional area within the 30% LOD is located within areas of previous disturbance from roadway and residential development. It is unlikely to contain intact, significant archaeological deposits and no additional archaeological fieldwork is recommended.

Archaeology study area map, page 3

Project Layout Sheet 10



2.3.5. Payne Avenue Station

The extents of trail reconstruction were extended to Edgerton for complete street reconstruction (Sheet 93). The left-turn lane for westbound Phalen Boulevard to southbound Payne Avenue was shortened to eliminate work on the existing bridge (Plan Sheet 94). In addition, the limits of full reconstruction versus mill and overlay were refined, bump outs and a maintenance vehicle pull-off pad were added, and BMP locations removed (Plan Sheets 93-94). All changes are within the previous LOD and archaeological survey area; therefore, no further archaeological work is recommended.

2.3.6. Arcade Street Station

Three locations are now under consideration by the DART for the Arcade Street Station (see Figure 1 through Figure 5). Alternative location options were requested to mitigate concern of pedestrians/cyclists using the dedicated guideway ramp to access the Bruce Vento Trail from Arcade Street, and concern about winter maintenance of the grade of the ramp connection. Option A is the same proposed station location in the 15% Plans and includes minor realignment of the Phalen Boulevard ramp and pedestrian connections to the Bruce Vento Trail (Figure 3). Option B is in the open area north of Phalen Boulevard, west of Arcade Street, and east and south of Neid Lane (Figure 4). Option C is at Wells Street on the north side of Phalen Boulevard (Figure 5).

All three options are located within the Project APE; therefore, no further architecture/history survey work is needed. The Options B and C are slightly outside of the LOD on the 15% plans. The 2020 archaeology report stated that along Phalen Boulevard, the Project “will generally use existing roadway to Arcade, then RCRRA ROW to Johnson Parkway; station area heavily disturbed, ROW heavily disturbed; no survey recommended (page 77).” The small additional area within the 30% LOD is located within areas of previous disturbance from roadway, railroad, and commercial development. The small areas are unlikely to contain intact, significant archaeological deposits and no additional archaeological fieldwork is recommended.

See Stipulation XI: Additional Assessment of Effect for the StPS&TF/Omaha Road Railroad Corridor Historic District for the recommended assessment of effects of the proposed station location options.

Further advancement of this station will occur in the 60% design phase. To receive consulting party comments on the new possible locations as per the MOA, which requires design considerations in relation to the StPS&TF/Omaha Road Railroad Historic District, the three proposed alternatives are included in this submittal and will be discussed at the consulting parties meeting to inform the 60% details (see Figure 1 through Figure 5).

FIGURE 1. BOUNDARY OF STPS&TF/OMAHA ROAD RAILROAD CORRIDOR HISTORIC DISTRICT IN BLUE NEAR THE ARCADE STREET RAMP.



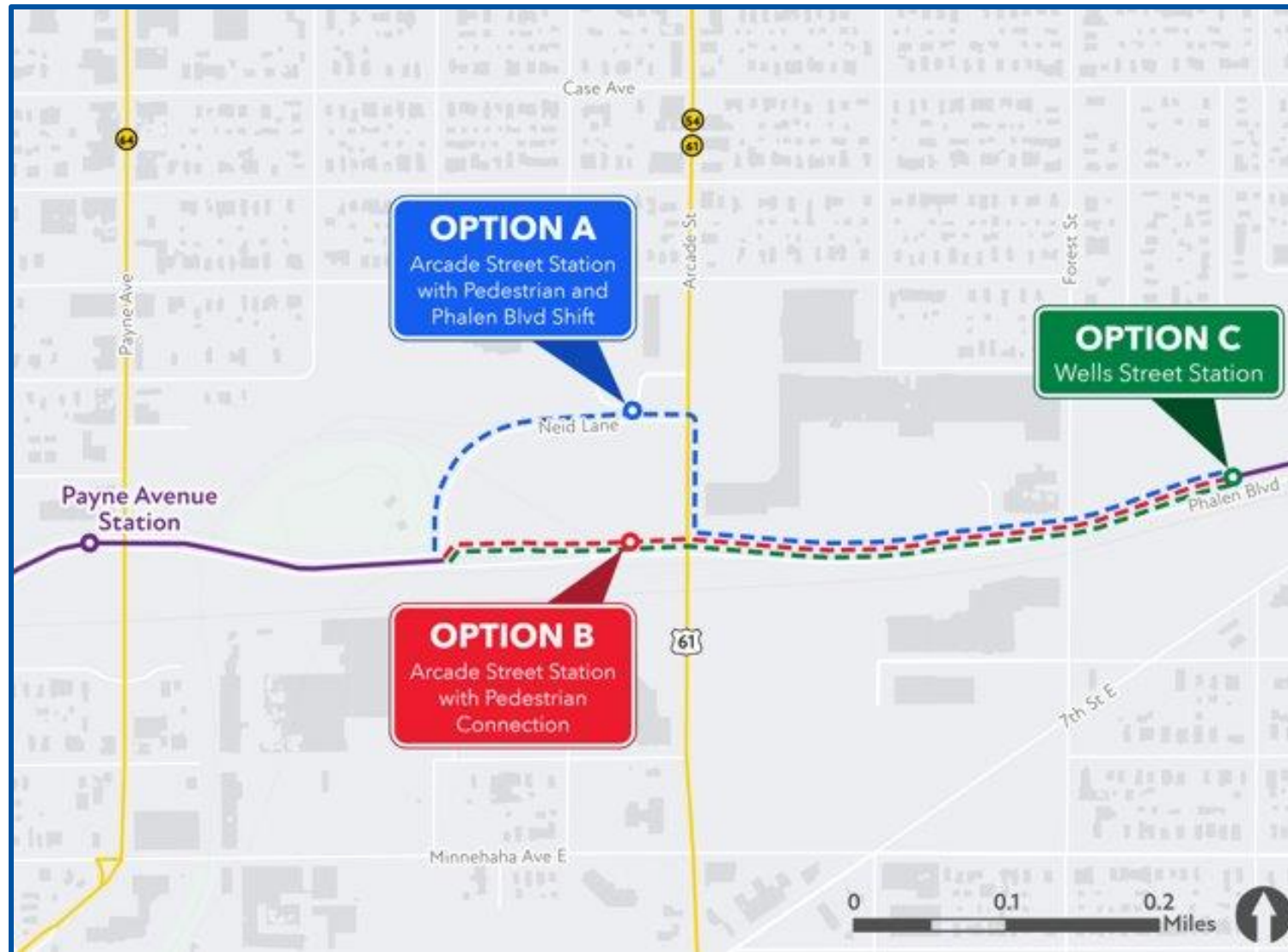
FIGURE 2. ARCADE STREET STATION ALTERNATIVE OPTIONS.

FIGURE 3. ARCADE STREET STATION ALTERNATIVE OPTION A.

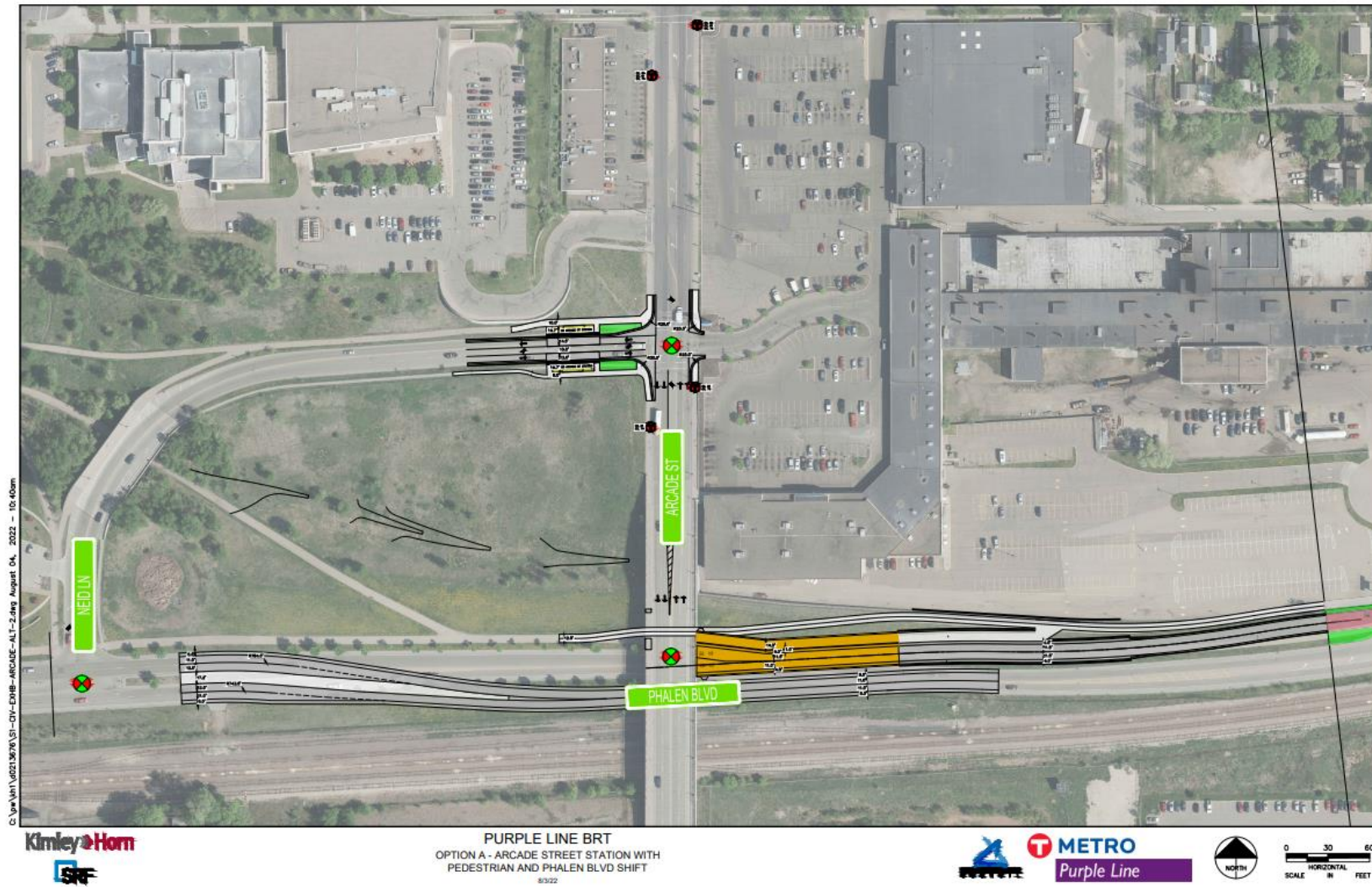


FIGURE 4. ARCADE STREET STATION ALTERNATIVE OPTION B.

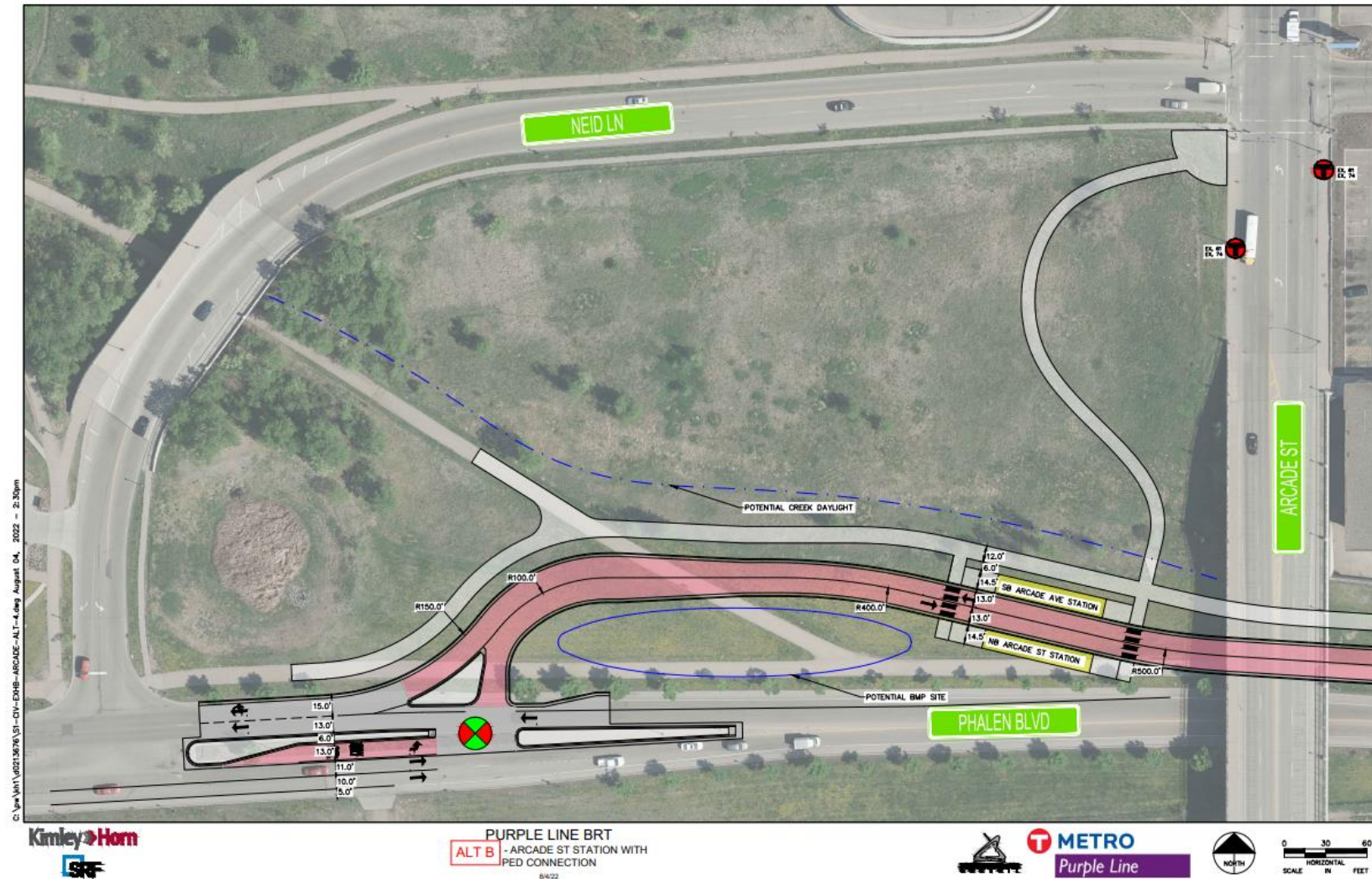
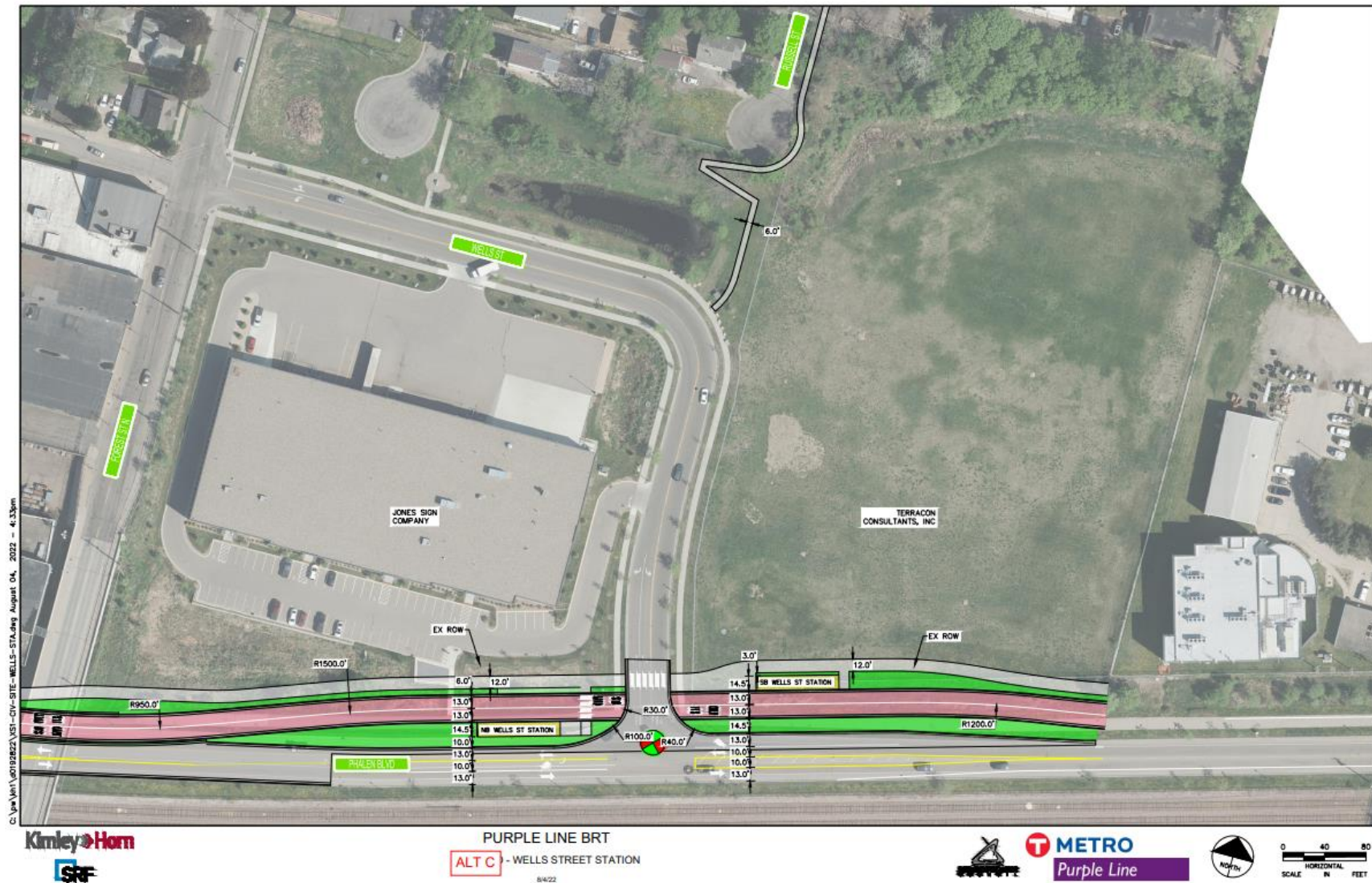


FIGURE 5. ARCADE STREET STATION ALTERNATIVE OPTION C.



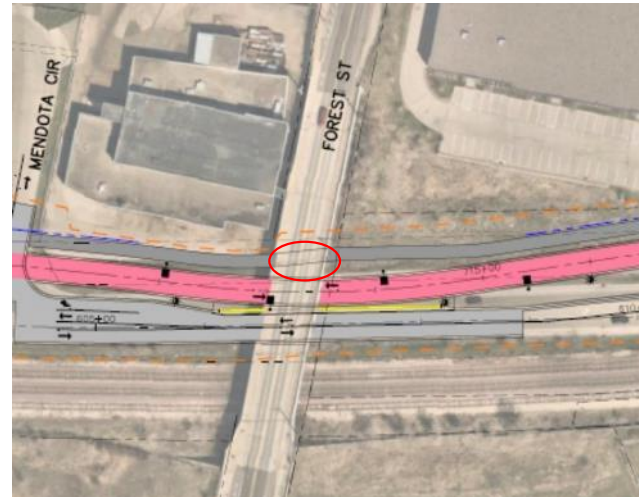
2.3.7. Between the Arcade and Cook Avenue Stations

The trail route was bumped out in two locations for BMP and a pedestrian crossing was added, though these bump outs are within the previous LOD and archaeology study area (Plan Sheets 99-101). The 30% LOD at Forest Street were slightly extended to the west (see red circle on layout sheet below). The 2020 archaeology report stated that along Phalen Boulevard, the Project “will generally use existing roadway to Arcade, then RCRRRA ROW to Johnson Parkway; station area heavily disturbed, ROW heavily disturbed; no survey recommended (page 77).” The small additional area within the 30% LOD is located within areas of previous disturbance from roadway and residential development. It is unlikely to contain intact, significant archaeological deposits and no additional archaeological fieldwork is recommended.

Archaeology study area map, page 5



Project Layout Sheet 14



2.3.8. Cook Avenue Station

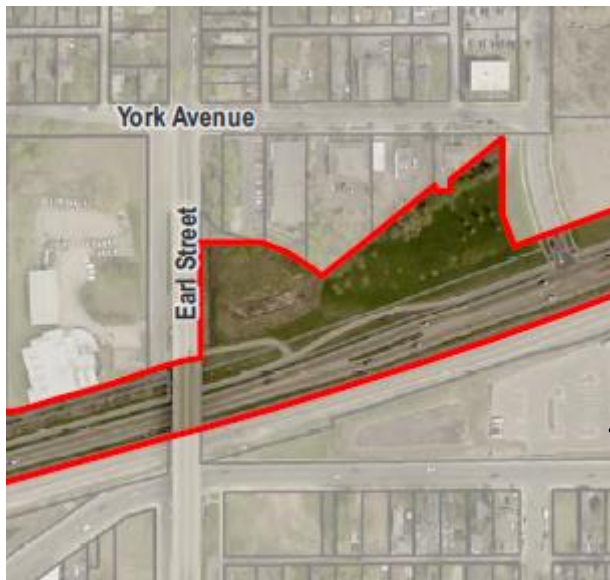
A retaining wall was added between the parking lot and trail due to grading constraints and to protect the parking lot. The station platforms were staggered, and the roadway section was revised to allow for enough space to incorporate access ramps between the stations and for pedestrians to have a single lane crossing. Pedestrian connection to Hmong Village was revised to be Americans with Disabilities Act (ADA) compliant and a maintenance pad pull-off added (Plan Sheet 107). The southern pedestrian connection to Magnolia was redesigned to save space and be more functional (Plan Sheet 109). Trail connection to the north was modified. However, all changes are within the previous LOD and archaeology pedestrian survey area; therefore, no further archaeological work is recommended.

2.3.9. Between the Cook Avenue Station and Johnson Parkway Bridge

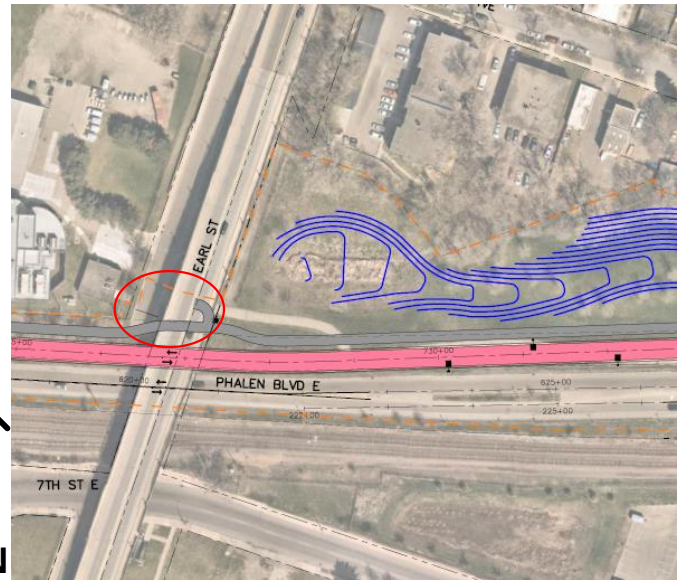
The 30% LOD at Earl Street were slightly extended to the west (see red circle on layout sheet below). The 2020 archaeology report stated that along Phalen Boulevard, the Project “will generally use existing

roadway to Arcade, then RCRR ROW to Johnson Parkway; station area heavily disturbed, ROW heavily disturbed; no survey recommended (page 77).” The small additional area within the 30% LOD is located within areas of previous disturbance from roadway and residential development. It is unlikely to contain intact, significant archaeological deposits and no additional archaeological fieldwork is recommended.

Archaeology study area map, page 5



Project Layout Sheet 15



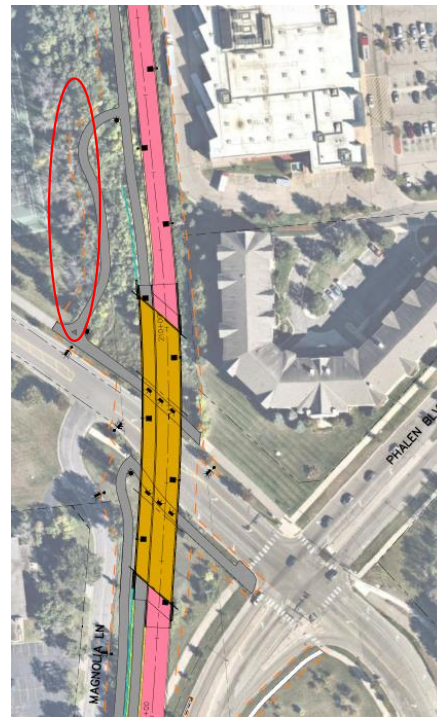
2.3.10. Johnson Parkway Bridge

The Johnson Parkway Bridge profile was altered to meet 40 mph design speed and maintain critical clearance. A new trail connection on the north side of Johnson Parkway is slightly outside the 15% LODs and an existing retaining wall will be removed (see red circle below on Layout Sheet 18; Plan Sheet 110). According to the 2020 Archaeology Report “rail connection to Phalen Park on St. Paul Park property – this area was originally part of Lake Phalen; fill deposited to fill in lake; no potential for prehistoric surficial deposits. No survey recommended.” It is unlikely to contain intact, significant archaeological deposits; therefore, no additional archaeological fieldwork is recommended. See Stipulation V.A.ii: Trail Design in Phalen Park discussion below on the trail design. A design concept for the bridge has been develop, as discussed under Stipulation VI.A.iii: Johnson Parkway Bridge Area below for recommendation on if the proposed design meets the SOI Standards.

Archaeology study area map, page 6



Project Layout Sheet 18



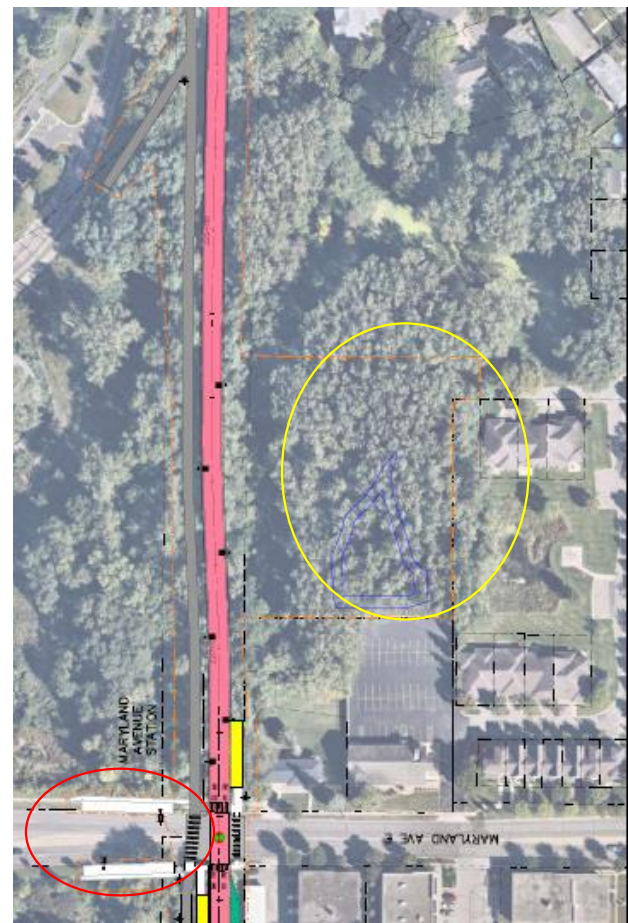
2.3.11. Maryland Avenue Station

The Maryland Avenue Station platforms were moved back from the intersection to allow for improved grading and ADA design. The bus pads on Maryland Avenue have been lengthened for local bus queueing. A maintenance pad pull-off was added (Plan Sheet 110). There is a small area not previously included in the archaeological study area boundaries for the extended bus pads (see red circle on layout sheet below). The bus extension areas are located within previously disturbed roadways and the area is unlikely to contain intact, significant archaeological deposits. The area within the yellow circle is located outside the 15% LOD. Based on the 2020 archaeological report and historic aerial (1940), the area “was originally part of Lake Phalen; fill deposited to fill in lake; no potential for prehistoric surficial deposits. No survey recommended (Page 77).” It is unlikely to contain intact, significant archaeological deposits; therefore, no additional archaeological fieldwork is recommended.

Archaeology study area map, page 6



Project Layout Sheet 19



2.3.12. McAfee Bridge (Bridge R0438)

The McAfee Bridge was proposed to be rehabilitated at the 15% plan stage but is now proposed to be replaced. As a non-reinforced-concrete bridge for which no plan sets exist, it is problematic for engineers to determine the bridge's load-carrying capacity for the Purple Line BRT, which would run on top of it. As such, there is no demonstrable way to repair the bridge with sufficient documentation that it meets load requirements. In addition, the revised typical section includes a wall between guideway and trail (Plan Sheets 111-112). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological fieldwork is recommended. The decision was made through the DART. See the Stipulation XI: Additional Assessment of Effects discussion below for review of this change for additional adverse effects to the LS&M Railroad Corridor Historic District.

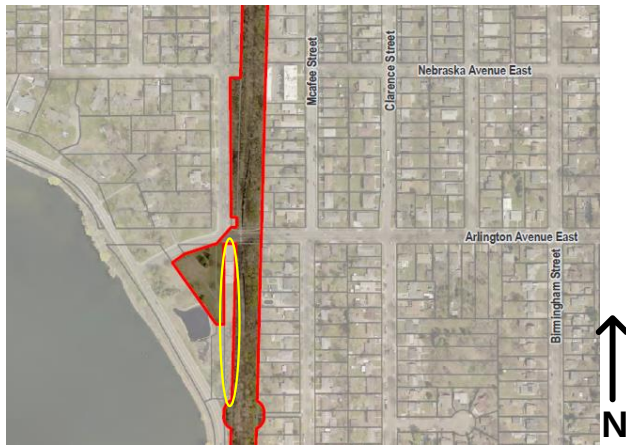
2.3.13. Arlington Avenue Area

A BRT bridge over Arlington Avenue was added to separate guideway conflicts from the local system and improve travel times. In the 15% plans, the crossing is shown as at-grade; however, due to traffic and safety modeling, the Project now proposes a bridge approximately 33 feet wide that is 20 feet high to meet 14-feet, 6-inch clearance and 5-foot structure depth. Fill will be added and retaining walls will be needed, likely concrete walls or MSE (Mechanically Stabilized Earth) walls. The change to a bridge crossing also resulted in the rerouting of the trail (Plan Sheet 114-115). The design details for both the bridge and the trail will be included in the 60% plans and will be discussed at the consulting parties meeting to inform the 60% details.

While the bridge introduces a new visual element, the Project APE in this area is large enough to not require adjustment. There are no additional architecture/history properties in the area for which to assess effects from the proposed bridge. For the LS&M Railroad Corridor Historic District, the proposed change will reestablish a bridge where historically one was located and a bridge requires less of the LS&M Railroad Corridor Historic District railbed to be removed compared to the at-grade options, which would need to be cut back extensively to taper it to grade. This change helps to minimize effects to the district overall, though not enough to remove the overall adverse effect finding.

The LOD were expanded slightly from the 15% plans, namely closing the gap between the southern bump-out and the triangle as shown below in the yellow circles. Since the entirety of the LS&M Railroad Corridor Historic District was pedestrian surveyed and the circle area was immediately adjacent, any notable features associated with the railroad line would have been identified. Further, the area was originally part of Lake Phalen, which has been filled to create the shoreline, the railroad, and parkway. Finally, this area does not coincide with the original 1868 alignment of the LS&M Railroad Corridor Historic District, which was the focus of the previous archaeological investigations. The area is unlikely to contain intact, significant archaeological deposits; therefore, no additional archaeological fieldwork is recommended.

Archaeology study area map page 7



Project Layout Sheets 20-21



2.3.14. Pedestrian Connection to Nebraska Avenue

A potential pedestrian connection to Nebraska Avenue was removed from the design due to grading constraints from the new bridge (Plan Sheet 115). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological work is recommended.

2.3.15. Larpenteur and Frost Avenue Stations

A maintenance vehicle pull-off area was added to both stations (Plan Sheet 118 and Sheet 122, respectively). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological work is recommended.

2.3.16. Gateway Overpass

The BRT alignment over the Gateway Trail was straightened, causing the abutments to become skewed and retaining walls lengthened. This was done to allow for better sight lines and bike routing, as well as a clearer BRT travel path (Plan Sheet 123). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological work is recommended.

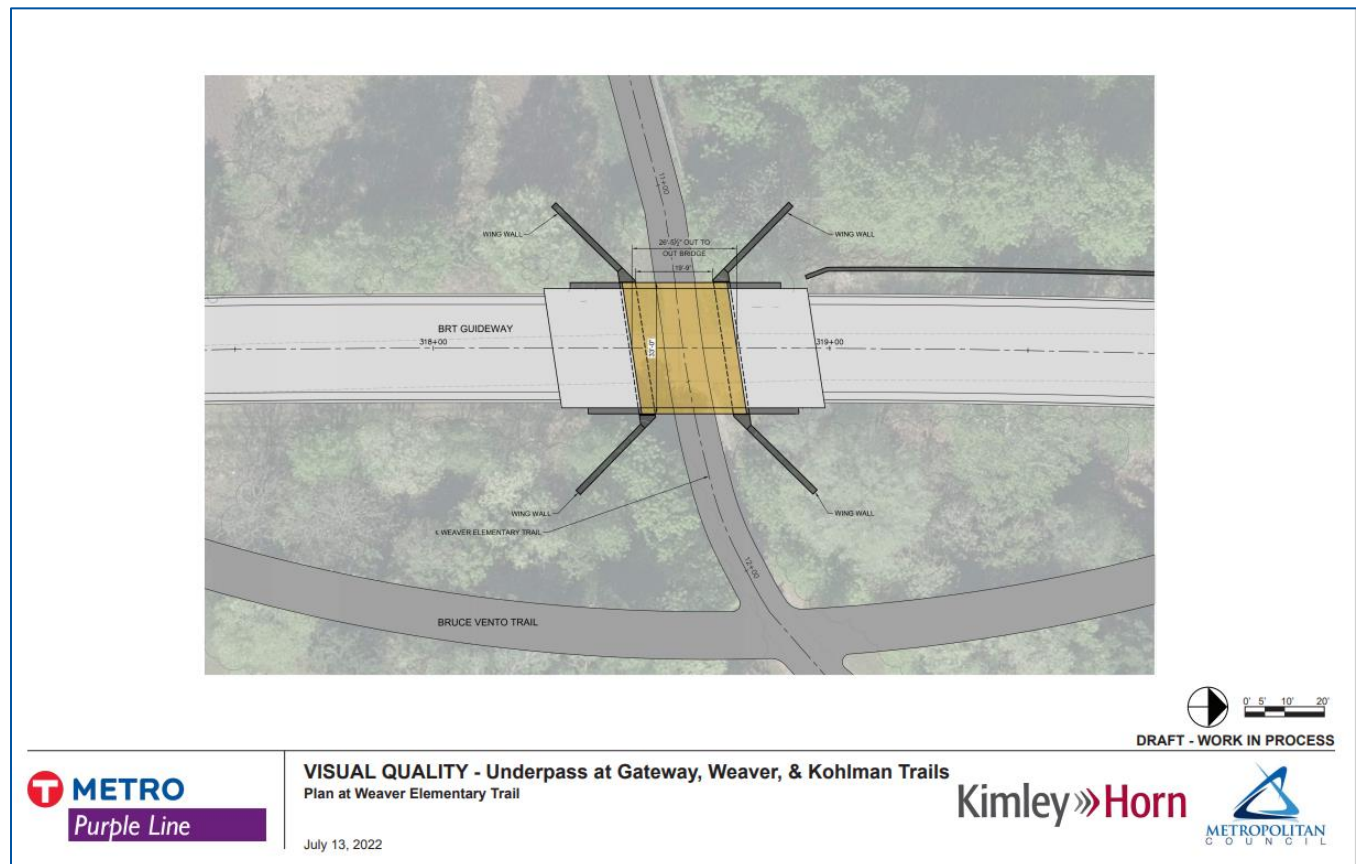
2.3.17. Trail Adjustment near Weaver Elementary School

Space has been added between the proposed trail and guideway (Plan Sheet 124) to attempt to avoid the 1868 LS&M railroad alignment (berms), which are individually eligible. Project Designers and the Preservation Lead are still working to determine if the Project can fully avoid the remnant berms, and the status of that decision will be discussed at the consulting party meeting between the 30% and 60% plans.

In addition, a bridge type has been selected (see Figure 6 and Plan Sheet B7 of B10) for the pedestrian underpass at Weaver Trail. The concrete beam bridge will have wingwalls instead of abutments, which minimizes physical elements in the space and allows for more vegetation, helping to avoid visual intrusion in the school's viewshed.

All changes are within the previous LOD and archaeology study area; therefore, no further archaeological fieldwork is recommended. See Stipulation VI.A.iv: Weaver Trail Underpass Area for discussion on if the proposed work meets the SOI Standards.

FIGURE 6. PROPOSED DESIGN FOR THE WEAVER TRAIL UNDERPASS.



2.3.18. Highway 36 Station

The park-and-ride at the Highway 36 station was changed from a parking structure as shown in the 15% plans to a surface parking lot. The 30% plans show updated path connection to existing paths, and the BRT crossing was raised to reduce earthwork. This rippled into rebuilding a portion of Gervais Avenue due to revised grades. The Project proposes to no longer incorporate bus pads on Gervais Avenue and to the reconfigured area to allow for ADA access. A maintenance pad pull-off was also added (Plan Sheet 130 and Sheet 140). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological fieldwork is recommended.

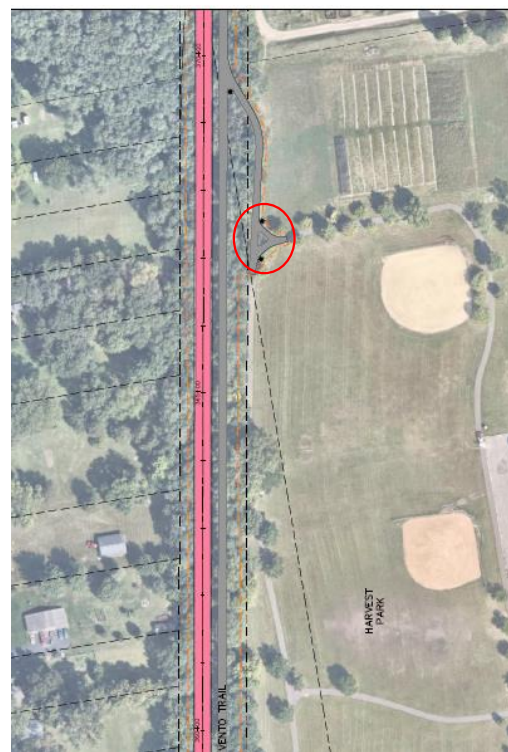
2.3.19. Harvest Park Area

The pedestrian trails near Harvest Park were realigned and regraded to minimize disturbance to the historic rail bed. The northern pedestrian connection was moved farther north to avoid historic rail bed and connected better with existing paths in Harvest Park (Plan Sheets 131-133). The decision was made through the DART. A small extension of the trail connection extends beyond the archaeological study area (see red circle below). The area has been heavily disturbed by previous railroad and park construction development; therefore, no further archaeological fieldwork is recommended.

Archaeology study area map, page 10



Project Layout Sheet 28



2.3.20. Between County Road C and Beam Avenue

A cul-de-sac proposed for replacement has been removed from the plans and retaining walls and trail reconstruction eliminated due to BRT alignment shift and design advancement (Plan Sheet 135). All changes are within the previous LOD and archaeology study area; therefore, no further archaeological fieldwork is recommended.

3. STIPULATION V: DESIGN REQUIREMENTS

The MOA requires, under Stipulation V: Design Requirements, the following:

- A. In order to minimize and/or avoid adverse effects to the Lowertown Historic District, Saint Paul Union Depot, Great Northern Railroad Corridor Historic District, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District, Johnson Parkway, Phalen Park, Moose Lodge 963, and Madeline L. Weaver Elementary School, the Metropolitan Council, with the assistance of the Metropolitan Council's Preservation Lead and input from Consulting Parties, as necessary, shall follow these design requirements to the extent feasible while still meeting the Project's purpose and needs:

3.1. Stipulation V.A.ii: Trail Design in Phalen Park and Johnson Parkway

Based on the 30% plans, the proposed design of the trail connection to the noncontributing Bruce Vento Regional Trail in Phalen Park blends visually and materially in Phalen Park through mimicking the profile and appearance of the existing bituminous trail (Plan Sheet 189). Therefore, this design requirement is met. The Preservation Lead will continue to monitor the trail design in Phalen Park throughout plan development and will notify FTA if there is a modification that changes this recommendation.

3.2. Other Stipulation V.A. Design Reviews

The design requirements for Stipulation V.A.i: Lowertown Historic District and Union Depot, V.A.iii: Moose Lodge 963, and V.A.iv: vegetative screening along the StPS&TF/Omaha Road Railroad Corridor Historic District, Johnson Parkway, and Phalen Park are under development and will be assessed at the 60% design stage, following input from consulting parties between the 30% and 60% plans.

4. STIPULATION VI: CONSULTING PARTY REVIEW OF CERTAIN PROJECT ELEMENTS UNDER THE SOI STANDARDS

4.1. Stipulation VI.A.i: Cayuga Street Station Area

The Purple Line Project's MOA states under Stipulation VI.A.i Consulting Party Review of Certain Project Elements under the SOI Standards:

The Cayuga Street Station, which abuts the StPS&TF/Omaha Road Railroad Corridor Historic District and is located near the Great Northern Railroad Corridor Historic District and Westminster Junction, including but not limited to Business Access and Transit (BAT) lanes, retaining walls, station platforms and amenities, trail connections, sidewalks, station vegetation, and stormwater Best Management Practices (BMPs). The Metropolitan Council should consider the mass, scale, and overall design of the Project elements. Vegetative screening shall be preserved or reestablished between the Project elements and the historic property where possible. Consulting Parties shall review Project elements within an area that extends approximately 800 feet southwest and approximately 200 feet northeast of the centerline of Cayuga Street.

In the 30% plans, there are two stormwater BMPs and a retaining wall within the review area around the Cayuga Street Station (Plan Sheets 89 and 90). The retaining wall is a soldier pile cantilever wall type with metal railing on top. The design of the Cayuga Street Station Area is under development and will be assessed at the 60% design stage, following input from consulting parties between the 30% and 60% plans.

4.2. Stipulation VI.A.ii: Barriers at Forest Street Bridge

The Purple Line Project's MOA states under Stipulation VI.A.ii Consulting Party Review of Certain Project Elements under the SOI Standards:

Barriers at Forest Street Bridge: Physical barriers, if used, under or near the Forest Street Bridge (Bridge No. 5962), a contributing resource to the StPS&TF/Omaha Road Railroad Corridor Historic District. Consulting Parties shall review Project elements within an area that extends approximately 200 feet on either side of the point at which the dedicated guideway crosses the centerline of Forest Street North.

A concrete barrier is included in the 30% plans within 200 feet on either side of Forest Street Bridge (Plan Sheet 100). The design of the barriers under and near the Forest Street Bridge is under development and will be assessed at the 60% design stage, following input from consulting parties between the 30% and 60% plans.

4.3. Stipulation VI.A.iii: Johnson Parkway Bridge Area

The Purple Line Project's MOA states under Stipulation VI.A.iii Consulting Party Review of Certain Project Elements under the SOI Standards:

In order to minimize and/or avoid adverse effects to . . . Johnson Parkway [and] Phalen Park. . . , the Metropolitan Council shall, with the assistance of the Metropolitan Council's Preservation Lead and input from Consulting Parties, design the below-referenced Project elements in accordance with SOI Standards to the extent feasible while still meeting the Project's purpose and need. If a City has officially designated the affected historic property for heritage preservation, the design shall also take into consideration, as feasible, any applicable design guidelines adopted by the City's HPC for the historic property.

Johnson Parkway Bridge Area: The Johnson Parkway Bridge, which passes over Johnson Parkway and is located near Phalen Park, and associated Project elements, including but not limited to retaining walls, trail connections, sidewalks, and BMPs. The Metropolitan Council should consider the mass, scale, and overall design of the bridge span, piers, railings, and abutments, and incorporate plantings in keeping with the park-like setting of the historic parkway and Saint Paul's Grand Round. Consulting Parties shall review Project elements within an area that extends approximately 700 feet south and approximately 500 feet north of the point at which the bridge crosses the centerline of Johnson Parkway.

If appropriately designed, the Johnson Parkway Bridge . . . may have minimal effect on the overall integrity of the [LS&M Railroad Corridor] historic district; however, construction would impact intact historic roadways in these areas and change the vertical alignment of the roadbed. Reviewing all of the proposed bridges for design in accordance with the SOI Standards and developing construction protection measures to avoid unintended damage from construction activities may minimize impacts to historic properties. However, these conditions would be unlikely to avoid adverse effects entirely.

There are three retaining walls and a concrete barrier in the designated review area near Johnson Park Bridge (see Plan Sheets 108-109). The plan view of the proposed Purple Line BRT Bridge over Johnson Parkway is shown in Figure 7. The bridge type and aesthetics is proposed to be similar to the Earl Street Bridge over Phalen Boulevard, which is the precedent design for the proposed Purple Line Bridge over Johnson Parkway (see Figure 7 through Figure 9 and Plan Sheets B1-B5 of B10). The City of Saint Paul has not officially designated Johnson Parkway, Phalen Park, or the LS&M Railroad Corridor Historic District for heritage preservation; therefore, there are no applicable City design guidelines. Below is the evaluation of the proposed Johnson Parkway bridge as per the SOI Standards for the Treatment of Historic Properties: Rehabilitation Standards.¹ Since it is such a large element of the Project and is proximate to three historic properties—Johnson Parkway, Phalen Park, and the LS&M Railroad Corridor Historic District—an assessment of the design against each of the ten standards is discussed below.

¹ Johnson Parkway (RA-SPC-5685 and RA-SPC-8497) was last evaluated by The 106 Group in 2017 under the inventory number RA-SPC-8497 for the proposed Gateway/Gold Line Bus Rapid Transit (BRT) Project. It was recommended eligible, and the Federal Transit Authority (FTA) determined, and the Minnesota State Historic Preservation Office (SHPO) concurred it was eligible for listing on the National Register. The FTA adopted the determination of eligibility made under the Gold Line BRT project for the purposes of the proposed Rush/Purple Line BRT project, including the period of significance for the historic property of 1914-1945. The SHPO coded Johnson Parkway as a "certified eligible finding" or "CEF", in their inventory database, meaning that it is eligible for listing in the National Register of Historic Places for the purposes of the Gold Line BRT Project but that if it was to be listed, additional evaluation of the property would be needed.

1. *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

The Project meets Standard 1 since Johnson Parkway and Phalen Park will continue to be used for its historic purpose as a parkway. The BRT corridor was abandoned for railroad use decades ago, so the Project's conversion of the railroad bed into a BRT is appropriate since it helps in maintaining the transportation use of the corridor.

FIGURE 7. PLAN VIEW OF PROPOSED PURPLE LINE BRT BRIDGE OVER JOHNSON PARKWAY.

Visual Quality Update: Bridge over Johnson Parkway

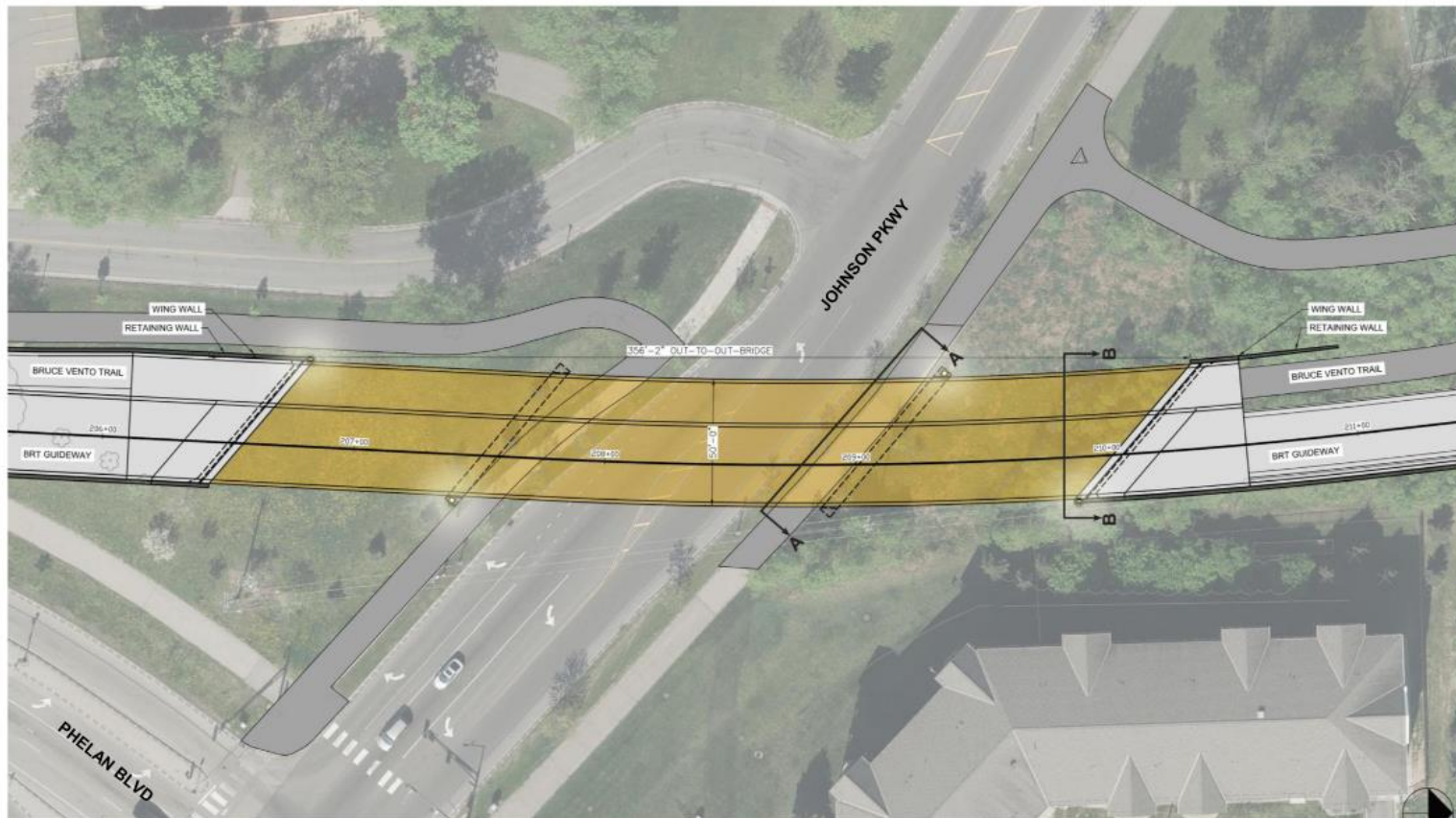


FIGURE 8. EARL STREET BRIDGE OVER PHALEN BOULEVARD, WHICH IS THE PRECEDENT DESIGN FOR THE PROPOSED PURPLE LINE BRIDGE OVER JOHNSON PARKWAY.

Visual Quality Update: Bridge over Johnson Parkway



Precedent Imagery at Earl Street Bridge

18

FIGURE 9. EARL STREET BRIDGE OVER PHALEN BOULEVARD, WHICH IS THE PRECEDENT DESIGN FOR THE PROPOSED PURPLE LINE BRIDGE OVER JOHNSON PARKWAY.

Visual Quality Update: Bridge over Johnson Parkway



Precedent Imagery at Earl Street Bridge

19



2. *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The Project meets Standard 2 because it will not remove or alter any historic materials, features, or spaces along Johnson Parkway. This area of the parkway was completely reconstructed in the early 2000s as part of a major road project so no historic material, features, or spaces from the period of significance (1914 to 1945) remain (see Figure 10). The Project will restore a crossing and bridge where there was one historically, meaning the character of the space will be maintained for the LS&M Railroad Corridor Historic District (see Figure 11). No physical work will occur within the boundaries of Phalen Park.

FIGURE 10. 1940 (LEFT) AND 2020 (RIGHT) AERIAL PHOTOGRAPHS OF THE NORTHERN SEGMENT OF JOHNSON PARKWAY. NOTE THE REMOVAL OF THE RAILROAD AND REPLACEMENT WITH PHALEN PARKWAY IN THE SOUTHWEST QUADRANT (SOLID YELLOW LINE), REMOVAL OF THE TRIANGLE INTERCHANGE AND REPLACEMENT WITH A FOUR-WAY INTERSECTION (YELLOW CIRCLES), AND ALTERATION OF THE EASTERN ARM OF THE PARKWAY (YELLOW DASHED LINE SHOWING PREVIOUS ROADWAY VERSUS SOLID YELLOW LINE REPRESENTING THE ROADWAY TODAY).

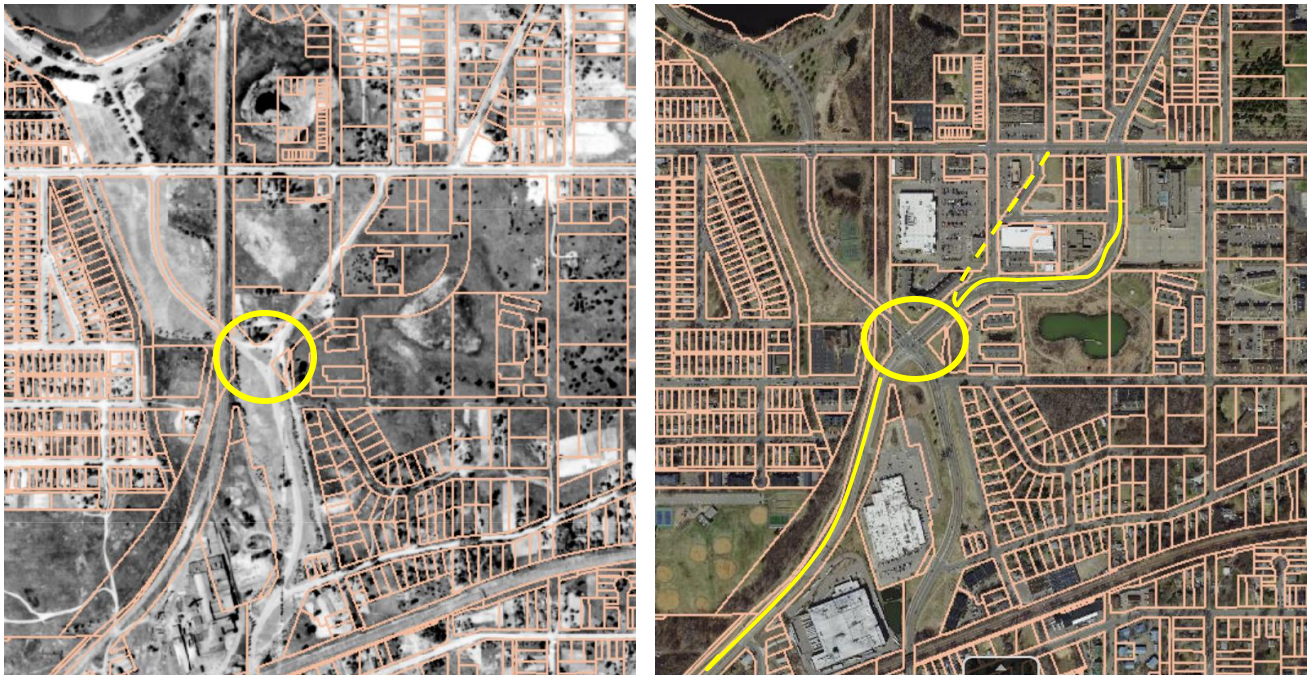
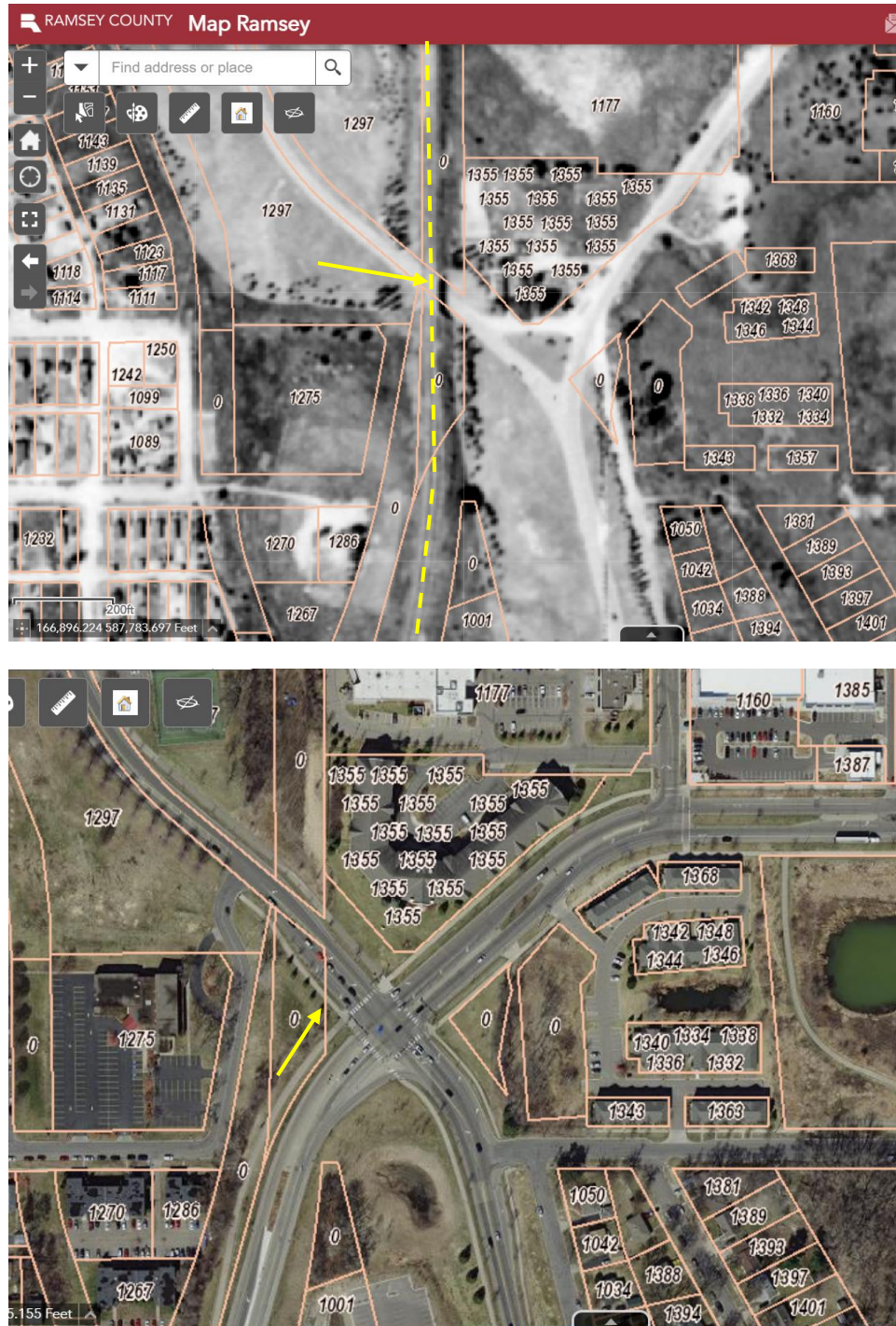


FIGURE 11. DETAIL OF JOHNSON PARKWAY, 1940 (TOP) AND 2020 (BOTTOM). NOTE THE TREES LINING THE RAILROAD CORRIDOR (YELLOW DASHED LINE) AND THE ORIGINAL RAILROAD BRIDGE CROSSING (YELLOW ARROW) IN THE 1940 AERIAL. BASED ON A REVIEW OF HISTORIC AERIALS, BY 1991, ALL ORIGINAL VEGETATION ALONG JOHNSON PARKWAY WAS REMOVED AND BY 2008, ALL THE TREES ALONG THE RAILROAD CORRIDOR WERE REMOVED. THE PLANTED LINE OF TREES (SEE YELLOW ARROW) FIRST APPEARS IN THE 2011 AERIAL.



3. *Each property shall 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 architectural elements from other buildings, shall not be undertaken.*

The Project proposes to restore a crossing where historically one crossed over Johnson Parkway from the LS&M railroad line; however, the Project is not attempting to replace the original bridge as a missing historical feature. Rather, the Project proposes building a new bridge to provide a safe crossing, which constitutes a compatible use and maintains the spatial features of both Johnson Parkway and the LS&M Railroad Corridor Historic District. The bridge will be a new element that does not create a false sense of historical development or alterations to the circulation patterns historically seen in either property. The bridge is following the design precedent extensively used throughout the city of Saint Paul, including nearby over Phalen Boulevard (see Figures 7 and 8). This continuity of design between new bridges throughout the city and specifically over Phalen Boulevard will help distinguish it as new construction. Since the Project does not propose adding conjectural features and there are no other architectural elements in Johnson Parkway or the LS&M Railroad Corridor Historic District to reference, it is unlikely the Project will create a false sense of historical development through the construction of the bridge. The proposed Johnson Parkway Bridge meets Standard 3.

4. *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

The changes made to the LS&M Railroad Corridor Historic District after the railroad was abandoned in the 1990s and to Johnson Parkway were completed in the early 2000s and those changes have not acquired historic significance in their own right; therefore, they do not need to be retained or preserved. No physical work will occur within the boundaries of Phalen Park. The proposed bridge meets Standard 4.

5. *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

As documented above, there is no remaining historic material of the parkway from the period of significance for Johnson Parkway and there is no proposed construction in Phalen Park. While minor effects will occur to the LS&M railroad berm to tie in the new bridge and approaches, this adverse effect has already been accounted for in the original finding of effects. The proposed bridge meets Standard 5.

6. *Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

As documented above, there is no remaining historic material from the period of significance for Johnson Parkway so there are no features to repair. Further, the Project is not trying to replace the railroad bridge but rather to use the crossing for a new transportation purpose, so the replacement consideration outlined in Standard 6 is not relevant to the Project. No physical work will occur within the boundaries of Phalen Park. The proposed bridge meets Standard 6.

7. *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*

No chemical or physical treatments are proposed to any historic materials. The proposed bridge meets Standard 7.

8. *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*

An archaeological survey was conducted previously, and no significant archaeological sites were identified; therefore, Standard 8 is not applicable.

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

As documented above, there is no remaining historic material from the period of significance; therefore, the Project will not destroy historic materials that characterize Johnson Parkway. The proposed bridge will be differentiated from the old, since the new bridge is not a railroad bridge and will not look like the original railroad bridge crossing. As discussed under Standard 3, the proposed bridge is following the design precedent extensively used throughout the city of Saint Paul, including over Phalen Boulevard at Earl Street (see Figure 8). This continuity of design between new bridges throughout the city and specifically over Phalen Boulevard will help distinguish it as new construction.

Johnson Parkway is a very large, linear corridor that extends for miles, so the addition of one bridge over a small portion of the roadway is in keeping with the massing, size, and scale for the overall parkway. Further, the new bridge was designed to have no center pier. While the bridge is highly skewed and would typically be constructed with a center pier, the Project designers determined a means to not need one, placing the piers on either side of the road and the abutments at a distance from the road to keep the parkway's roadway free of piers and to minimize the visual intrusion of the structure on Johnson Parkway (see Figures 7-9). To protect the historic integrity of Johnson Parkway and its environment, the Project proposes planting trees to screen the new bridge and to be in keeping with the park-like setting of the parkway. This design element will help to continue the parkway character and helps the new bridge be compatible in the environment. The Johnson Parkway Bridge may be partially visible from the very southern end of Phalen Park; however, the scale and massing of the bridge is such that it will not create any visual effects to the historic property and its environment. The proposed bridge meets Standard 9.

10. *New additions and adjacent or related new construction shall 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.*

The bridge and guideway could be removed in the future, and the essential form and integrity of Johnson Parkway and Phalen Park and their environment would be unimpaired. The proposed bridge meets Standard 10.

The proposed Johnson Parkway Bridge meets the SOI standards. The design of the retaining walls and concrete barrier near the Johnson Parkway Bridge Area is under development and will be assessed at the 60% design stage, following input from consulting parties between the 30% and 60% plans.

4.4. Stipulation VI.A.iv: Weaver Trail Underpass Area

The Purple Line Project's MOA states under Stipulation VI.A.iv Consulting Party Review of Certain Project Elements under the SOI Standards:

Project elements near Madeline L. Weaver Elementary School, including but not limited to the Weaver Trail Underpass, trails, vegetation, and stormwater BMPs. The Metropolitan Council should consider the structure's mass, scale, and overall design of the bridge span, piers, railings, and abutments, and its visibility within the historic property's viewshed. Vegetative screening shall be preserved or reestablished between the Project elements and historic properties where possible. Consulting Parties shall review Project elements within an area that extends approximately 400 feet south and approximately 800 feet north of the centerline of the proposed Weaver Trail Underpass.

A concrete beam bridge with wingwalls is proposed to avoid the use of piers and abutments and to maximize the presence of vegetation at the crossing in the side slopes. (see Figure 6 and Plan Sheet B7 of B10). The plan sheet shows concrete wingwalls with limestone pattern. The Preservation Lead is working with the DART to on a simpler design for the concrete wingwalls in which they will be plain concrete with no design or pattern. Based on the 30% plans, there are two proposed retaining walls and a concrete barrier (Plan Sheet 125-126) in the defined review area. There are no stormwater BMPs in the defined review area.

The design of the underpass and retaining walls and concrete barrier near the Weaver Trail Underpass Area is under development and will be assessed at the 60% design stage, following input from consulting parties between the 30% and 60% plans.

4.5. Stipulation VI.A.v: Dedicated Guideway and Fitch/Barclay Trail Underpass

See Stipulation VIII summary below for information about the Dedicated Guideway and Fitch/Barclay Trail Underpass: Project elements near the 1868 railroad roadway remnants between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002) and/or between Gervais Avenue and County Road C (XX-RRD-NPR003).

5. STIPULATION VII: CONSTRUCTION PROTECTION PLAN FOR HISTORIC PROPERTIES (CPPHP)

It is recommended that CPPHPs are not needed. As demonstrated by the Section 106 review for a similar project, the Gold Line BRT from Woodbury to Saint Paul, it was recommended by the Preservation Lead, the Cultural Resources Unit (CRU) in MnDOT, that while the Gold Line Project Programmatic Agreement (PA) required CPPHPs, FTA, SHPO, and other consulting parties determined it was preferable to notify the construction contractor of the location of historic properties and possibly potential means and methods of construction. Ideally, contractors are held responsible for determining the best construction means and methods, and that if notified that there are protected historic properties present, they can be tasked with providing the Preservation Lead a summary of their construction plan proximate to the historic properties of concern. Further, since CPPHPs are not part of a formal bid package, they are not contractually enforceable; therefore, putting notification in the plans and contract of the properties can be more effective.

It is therefore recommended that the following historic properties, which are outside of the Project construction limits, do not require a CPPHP: East Shore Drive, contributing to Phalen Park; the Great Northern Railroad Corridor Historic District; Westminster Junction; and the StPS&TF/Omaha Road Railroad Corridor Historic District. A CPPHP is also not recommended for Madeline L. Weaver Elementary School as limited project activity will occur on the far northern end of the boundary of the property, as detailed above, and most will be on an existing non-historic trail. The active railroad lines or roadways are not likely to experience physical effects from the Projects and most contractors are cognizant to avoid entering active railroad lines or roadways. Nonetheless, it is proposed that, like the Gold Line Project, in lieu of CPPHPs, final plans will document the location of sensitive historic properties and will be identified as “do not disturb areas,” meaning no staging, equipment storage, or any other related project activities can occur in those areas. No plan can ensure that accidents will not happen, and it is recommended that using the recommendations presented herein will meet the intent that the contractor take care of historic properties proximate to or slightly within the Project’s construction limits. This recommendation will be discussed at the consultation meeting to solicit input from the consulting parties and if all parties agree in writing, the MOA does not need to be modified.

Consulting parties should discuss the need for a CPPHP for the 1868 railroad roadway remnants between Kohlman Avenue and Beam Avenue and between Gervais Avenue and County Road C if it is determined through Stipulation VIII.A in the future that it is prudent and feasible for the Project to avoid one or both of the historic properties. If they can be avoided, it is recommended that inclusion of measures in the construction documents and/or the notification to the contractor to provide the means and measures for avoidance be used.

6. STIPULATION VIII: MITIGATION FOR ADVERSE EFFECTS TO THE LS&M RAILROAD CORRIDOR HISTORIC DISTRICT

Avoidance through design of the 1868 railroad roadway remnants between Kohlman Avenue and Beam Avenue and between Gervais Avenue and County Road C is in process and updates to avoid or minimize effects will be identified with the 60% plans.

7. STIPULATION IX: CHANGES TO THE AREA OF POTENTIAL EFFECTS (APE)

Based on 30% design review as documented above under Stipulation IV, no changes are proposed to the Project APE.

8. SECTION X: ADDITIONAL SURVEY AND EVALUATION

Based on 30% design review as document above under Stipulation IV, no additional survey or evaluation is recommended.

9. STIPULATION XI: ADDITIONAL ASSESSMENT OF EFFECTS AND STIPULATION XII: CONSULTATION TO RESOLVE ADDITIONAL ADVERSE EFFECTS

9.1. StPS&TF/Omaha Road Railroad Corridor Historic District

The three alternative locations for the Arcade Street Station are recommended to have No Adverse Effect to the StPS&TF/Omaha Road Railroad Corridor Historic District. Although construction of the Project would introduce temporary and permanent visual effects within the viewshed of the StPS&TF/Omaha Road Railroad Corridor Historic District, the proposed conditions help to avoid or minimize alteration to any of the characteristics that qualify the historic property for inclusion in the National Register or diminish its integrity of setting, feeling, or association.

The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

- As part of design development along the northern edge of the historic property, vegetative screening will be reestablished wherever possible between Project elements and the StPS&TF/Omaha Road Railroad Corridor Historic District.
- To minimize visual effects and maximize compatibility with the StPS&TF/Omaha Road Railroad Corridor Historic District while still meeting the Project's Purpose and Need, the design of the Arcade Street Station, whether it is in location Option A, B, or C, will be reviewed according to the SOI Standards at the Project's 60%, 90%, and 100% Plans, with a consultation meeting prior to finalization of 60% design.

9.2. LS&M Railroad Corridor Historic District

Additional analysis between the 15% and 30% plans led to the determination by the Project designers that Bridge R0438 (McAfee Bridge) is so deteriorated that its condition precludes repair, and it will be replaced. As a contributing element to the LS&M Railroad Corridor Historic District, the action of removing the original bridge constitutes an additional element contributing to the adverse effect to the historic district. Since the 30% plans include a modification from the 15% plans to a known historic property, the Project MOA requires:

The FTA, with the assistance of the Metropolitan Council's Preservation Lead, shall make a finding of effect to account for any changes in Project design or the receipt of additional information that may result in newly identified historic properties, changes in the finding of effect for a historic property, or unanticipated effects (e.g., damage) to historic properties. The Metropolitan Council's Preservation Lead shall assess effects of the Project on historic properties in accordance with the criteria of adverse effect as described in 36 CFR § 800.5(a)(1) and make a recommendation to FTA, supported by documentation that meets the requirements of Stipulation II.A. The Metropolitan Council's Preservation Lead shall also recommend to FTA potential measures for avoiding, minimizing, and/or mitigating any adverse effect(s).

As per the terms of Stipulation XII, the new bridge should be designed in accordance with the SOI Standards to the extent possible to minimize additional effects. The 30% plans also reduce the LOD to other portions to the LS&M Railroad Corridor Historic District, namely at the Arlington bridge crossing, which will allow for more of the railroad bed to remain intact.

10. RECOMMENDATIONS

RPA-Registered archaeologist and historian Kristen Zschomler and historians Christina Slattery and Valerie Reiss have reviewed the Project's 30% plans and recommend the following.

- Most project changes between the 15% and 30% plans were within the same LODs at the 15% stage. There were several locations that extended beyond the LOD at the 15% plan stage; however, based on the project methodology as detailed in the 2020 archaeology report, all appear to have low potential for containing intact, significant archaeological sites due to previous residential, commercial, and/or railroad and roadway development. Therefore, no additional archaeological fieldwork is recommended.
- No change to the Project APE is recommended since all the changes and their potential to affect the character or use of historic properties, if any are present, are sufficiently accounted for in the previous APE boundaries.
- As per Stipulation VI.C, it is recommended that the proposed Johnson Parkway Bridge meets the SOI Standards and that commitment is completed, pending the receipt of consulting parties' comments and the consideration of such comments, as per Stipulations VI; and continued review by the Preservation Lead should occur to determine if design changes warrant reinitiating consultation.
- As per Stipulation VII, it is recommended that no CPPHPs are needed and that other means of notifying the contractor of the presence of historic properties as documented above be used, pending the receipt of consulting parties' comments and the consideration of such comments.
- The planned replacement of Bridge R0438 (also known as the McAfee Bridge) constitutes the loss of original historic fabric from the LS&M Railroad Corridor Historic District. FTA should consult with consulting parties per Stipulation XII on determining if additional mitigation will be required, or if the minimization efforts in other locations, namely the Arlington Bridge crossing, makes the current mitigation commitment commensurate with the effects to the historic district overall. As per the terms of Stipulation XII, the new bridge should be designed in accordance with the SOI Standards to the extent possible to minimize additional effects.

Join the Heritage Preservation Commission

