Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District Reevaluation

Local Historic Bridge Study – Phase 3

Report prepared for

Minnesota Department of Transportation

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Introduction

Mead & Hunt, Inc. (Mead & Hunt) prepared a reevaluation of the historic integrity of the National Register of Historic Places (National Register)-listed Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District (CM&StP Historic District) at the request of the Minnesota Department of Transportation (MnDOT) Cultural Resources Department (CRU). The 2.8-mile historic district follows a straight, linear path from Humboldt Avenue, at its western end, to 28th Street in the east. The historic district is a component of a larger former railroad line that is now the Midtown Greenway in south Minneapolis. Presently featuring a trail for bicycles and walking, the Midtown Greenway is owned by the Hennepin County Regional Railroad Authority (HCRRA) and the trail is maintained by the City of Minneapolis.

Recent changes to the district and its setting prompted MnDOT CRU to request reevaluation of its historic integrity for the purpose of considering the appropriateness of delisting the district. Reevaluation of a listed historic property or district is allowed by the National Park Service (NPS), as indicated in the National Register Bulletin *How to Complete the National Register Registration Form*, if the property exhibits "deterioration or loss of historic integrity."[1] Certain requirements must be met to remove a property from its National Register listing and such delisting is a rare occurrence. The Minnesota State Historic Preservation Office (SHPO) is responsible for review of National Register Nominations; petitions to delist are made to the Keeper of the National Register.

This reevaluation joins a number of previous studies within the CM&StP Historic District. An overview of these past studies can be found in Appendix A. This report focuses on resources within the CM&StP Historic District boundaries, which were defined when the property was listed in 2005. Reevaluation efforts included field survey in October 2015, including identification of current conditions, resources, features, and alterations; creation of a map to provide a visual understanding of changes to the district as a whole and to aid in the reevaluation process; consultation among MnDOT CRU, its consultant historians from Mead & Hunt, and the SHPO; and preparation of this report. This report is organized in three sections:

- Section 1 provides an overview of the 2005 CM&StP Historic District National Register Nomination, including background on Nomination preparation and discussion of significance, resources within the district, and integrity.

- Section 2 presents the reevaluation, which is comprised of an explanation of alterations since the time of the Nomination was completed, reassessment of the number of resources within the property, and discussion of integrity of the district.

- Section 3 provides recommendations for the historic district, including a proposed approach for review of future projects within contributing portions of the district.

[1] National Park Service, *National Register Bulletin: How to Complete the National Register Registration Form* (Washington, D.C., National Park Service, 1997), http://www.nps.gov/nr/publications/bulletins/nrb16a/, 72.

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1. National Register Nomination

The CM&StP Historic District was listed in the National Register in 2005. The following provides an overview of how the Nomination was prepared and a summary of the district's historic context, significance, resource count and integrity as presented in the Nomination, which is included in Appendix B.

A. Nomination preparation

In 2002 the 106 Group (applicant) began preparation of a National Register Nomination for the CM&StP Historic District on behalf of the Hennepin County Department of Housing, Community Works, and Transit. The majority of the Nomination text, resource counts, and photographs was prepared in 2002. At the time photographs of the district were taken in 2002, only half of the trail improvements were made; therefore, the photographic record is limited. Letters were exchanged in 2003 and 2004 concerning revisions to the Nomination and the period of significance was determined in consultation between the SHPO National Register reviewer and applicant. Photos for inclusion in the final Nomination package were selected in coordination with the National Register reviewer on July 9, 2004. The applicant submitted the final Nomination to the SHPO on December 22, 2004. The State Review Board reviewed and unanimously approved the Nomination to list the CM&StP Historic District in the National Register in March 2005 and the district was formally listed on June 1, 2005.[2]

B. Historic context

From the late 1870s through the early twentieth century the Chicago, Milwaukee & St. Paul Railroad operated an at-grade rail line through south Minneapolis. The need for a grade separation of rail and other traffic grew as Minneapolis saw increased residential and commercial uses on either side of the line. Following many years of contentious negotiations leading to a legal battle, the Chicago, Milwaukee & St. Paul Railroad and City of Minneapolis (City) agreed on depressing the railroad line into a trench and constructing a series of grade-separation structures to carry city streets over the depressed rail line.

Work commenced on construction of the trench and grade-separation structures in 1912 and was completed in 1916 (Figure 1).

[2] Information on the draft nomination, review, and approval is available in the CM&StP Historic District National Register file; March 22, 2005. State Review Board meeting minutes; and CM&StP legal file. These documents are available at the Minnesota Historic Preservation Office, St. Paul, Minn. 106 Group, National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Hennepin County, Minnesota, National Register #78001543.

Figure 1. Grade separation trench under construction, view looking west from 1st Avenue (now the location of I-35W). Note bridge abutments under construction. Image from the City of Minneapolis Transportation Department photograph collection, courtesy of Gemini Research.[3]

C. Significance

As identified in the Nomination, the CM&StP Historic District is significant at the local level under National Register *Criterion A* in the area of Community Planning and Development. The district's significance is described as follows: "it represents the culmination of efforts by citizens, city government, and city planners of Minneapolis to direct the future growth and appearance of south Minneapolis while ensuring the safety of its residents and maintaining economically necessary industrial interests."[4] District boundaries defined in the Nomination encompass the 2.8-mile corridor from Humboldt Avenue to 28th Street and correspond with the boundary identified on as-built plans. The district's period of significance extends from 1912, when construction began, to 1916, when construction was complete.

D. Resource count

As identified in the Nomination, the CM&StP Historic District contains 31 contributing resources, comprised of one building and 30 structures. The Nomination identifies a total of 17 noncontributing resources, including seven buildings and 10 structures. A breakdown of the number of resources is presented in Table 1.

[3] Historic photographs of the CM&StP Grade Separation while under construction between 1912 and 1916 can be viewed online in the Midtown Corridor General Bridge Management Plan (prepared by Olson & Nesvold Engineers in 2015) at http://www.dot.state.mn.us/historicbridges/bridge/greenway/midtown-corridor-mgmt-plan.pdf.

[4] National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Section 8, 1.

Table 1. Number of resources within CM&StP Historic District National Register Nomination[5]

Resource	Contributing	Description	Noncontributing	Description
Buildings	1	Twin City Separator Company Building (now nonextant)	7	Norris Creameries (now nonextant); 6 other extant noncontributing buildings
Sites	0		0	
Structures	30	28 bridges	10	9 bridges
		Original retaining walls (counted as one resource)		Bicycle/pedestrian trail
		Trench		
Objects	0		0	
Total	**31**		**17**	

Other district resources identified within the Nomination but not included in the resource count include original iron picket fencing, utility poles, light standards, telephone boxes, access ramps, and modern chain-link fencing. These are noted as minor features, many of which were added from 2000 to 2004.[6]

E. Integrity

Within the Nomination, discussion of historic integrity is limited and there is no evaluation of the seven aspects of integrity. Rather, historic integrity is specifically addressed within the Nomination only twice: once in relation to the contributing Twin City Separator Company (now nonextant) and again for the noncontributing Western Alloyed Steel Casting South Company.[7] The Nomination addresses alterations but concludes that the "form and shape of the grade separation project and its significant contributing features remain intact."[8]

Alterations identified in the Nomination include:

- Removal of original railroad tracks and signals.
- Removal of original sidings and switching yards.
- Construction of an ashlar block retaining wall to elevate the trail, comprised of a paved surface, within the north and central portions of the trench, including access ramps from street level in several locations.
- Construction of pedestrian amenities, such as lighting, trash receptacles, wayfinding signs, etc.

[5] National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Section 5.

[6] National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Section 7, 10.

[7] National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Section 7, 2 and 3

[8] National Register of Historic Places, Chicago, Milwaukee and St. Paul Railroad Grade Separation, Section 7, 2.

- Removal of industrial properties along the rail line, particularly the north side.
- Construction of industrial buildings outside the period of significance.
- Replacement or removal of nine bridges.
- Alterations to original bridges, including concrete repairs, replacement railing, or metal pipe railings to meet safety standards.
- Removal of original iron picket fencing and addition of new chain-link fencing.

2. Reevaluation

At MnDOT CRU's request as part of the Local Historic Bridge Study – Phase 3, Mead & Hunt historians conducted a reevaluation of the historic integrity of the CM&StP Historic District in 2015-2016. MnDOT CRU recognizes that new development has occurred within and directly adjacent to the district, and bridges have been replaced. Additionally, MnDOT CRU expressed concern about the completeness of the Nomination, as it included limited evaluation of historic integrity and identified many large-scale structures as "minor" features. As such, it did not fully consider changes occurring within the district in the several years prior to National Register listing. MnDOT CRU's interest in the integrity of the district stems from its role as the delegated agent for the FHWA for administering reviews required under Section 106 of the National Historic Preservation Act (NHPA) when federally funded projects occur within the district's boundary. Typical projects within the district are bridge rehabilitations or replacements that utilize a combination of federal, state, and local funding. As such, MnDOT CRU works closely with the HCRRA and the City to conduct Section 106 and 4(f) evaluations on proposed bridge work.

The reevaluation is informed by National Register regulations and guidance documents, as cited throughout. As stated in the National Register Bulletin: "To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity."[9] The district's significance under *Criterion A* is not questioned by this report. The reevaluation of the CM&StP Historic District focuses on the district's historic integrity, which is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's prehistoric or historic period."[10]

In order to assess historic integrity, historian's reviewed the National Register Nomination, previous studies (included in Appendix A), and historical documents, including photographs, articles, and maps. To document the 2016 appearance of the district and how it has evolved over time, a discussion of the district from its completion to the present day is presented below. The reevaluation also presents an updated resource count based on NPS guidelines and an analysis of the district's present historic integrity.

A. What the district looked like when it was constructed

At the time of its construction, the 2.8-mile depressed CM&StP railroad line extended through a mixed-use residential and industrial area. As indicated in the Nomination, over half of the properties along the railroad line were industrial and included lumber yards, foundries, grain elevators, and manufacturing businesses. Generally, industrial buildings were one to three stories in height, with grain elevators considerably taller. Industrial uses were predominantly along the north side of the rail line, with residential homes largely situated to the south of 29th Street and behind industrial buildings to the north (Figures 2 and 3). The neighborhoods surrounding the line were comprised of working- or middle-class residential houses. The mixed-use nature of the area was at the heart of the legal negotiation to create the grade separation.

[9] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 44.

[10] National Park Service, *National Register Bulletin: How to Complete the National Register Registration Form*, 4.

Figure 2. c.1915 image of the grade separation under construction. View from 5th Avenue east toward Portland and Oakland Avenues. Note the Bagley Grain Elevator (later to be replaced by the Stewart Grain Elevator; nonextant) in the background. Photograph by C.J. Hibbard, c.1915, Minnesota Historical Society.

Figure 3. c.1915 photograph of the CM&StP Grade Separation under construction between Dupont and Emerson Avenues. Image from "Track Depression Work of the C.M. & St. P. Ry. at Minneapolis," Railway Review, July 17, 1915, pg. 70.

At its completion, the CM&StP grade separation consisted of a 22-foot-deep trench. The base of the trench measured between 35 and 60 feet while the top of the trench ranged from 110 to 135 feet wide (Figure 4). The base of the trench was flat with a double-track main line running through the center and a series of sidings for both industrial or railroad operations on either side of the main line. Nearing 5th Avenue from the west, the rail line was not depressed, creating the only at-grade crossing. At 5th Avenue the railroad tracks widened out to accommodate a rail yard north of the tracks. The rail line was again depressed as it continued east toward Cedar Avenue. As part of the grade separation construction effort the CM&StP Railroad also reconstructed a portion of 29th Street, between 10th and Cedar Avenues, to accommodate the width of the trench (Figure 5).

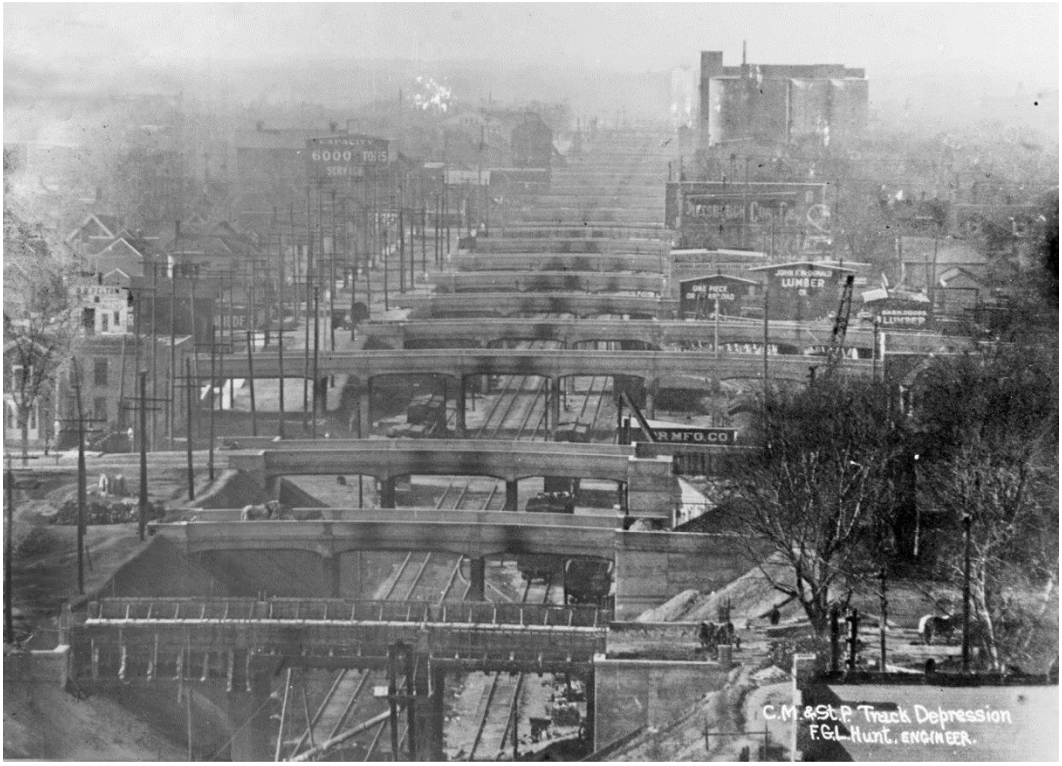

Figure 4. c.1915 image of the corridor nearly finished. View from Park Avenue looking west. Note the industrial uses on the north (right) side of the corridor. Photograph from "Views of the 29th Street Track Depression Construction Project in Minneapolis," annotated photograph album, Minnesota Historical Society.

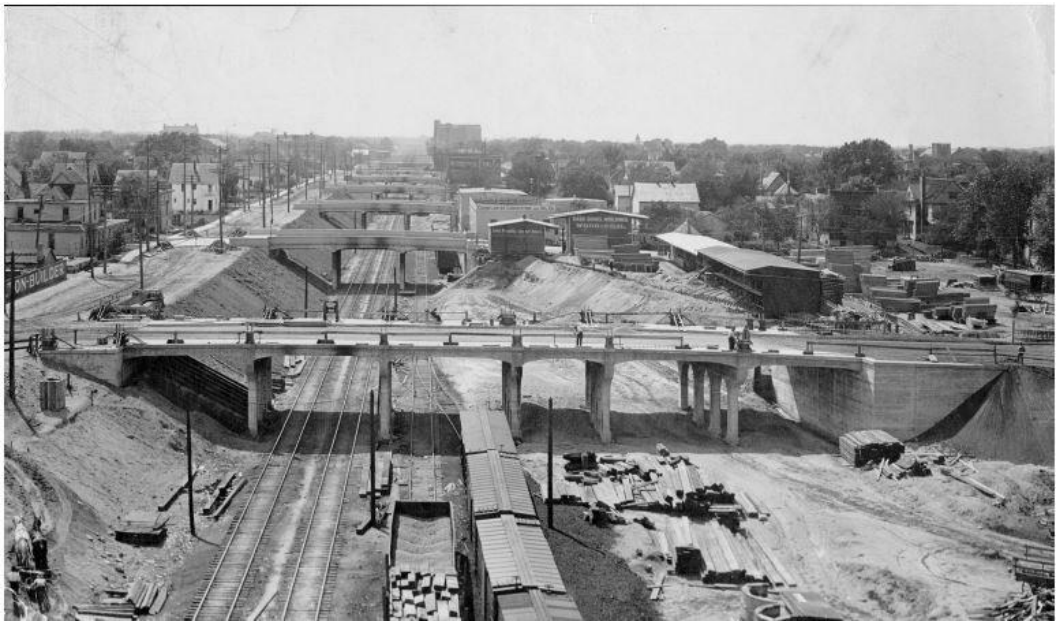

Figure 5. c.1915 photograph showing construction of 29th Street, bridges over the CM&StP Grade Separation, and the rail yard at Clinton Avenue. The Clinton Avenue Bridge is in the foreground followed by the 3rd, 2nd, and Stevens Avenue Bridges (all of which are nonextant). Photograph by C.J. Hibbard, c.1915, Minnesota Historical Society.

For the majority of the grade separation, the trench walls were comprised of earth, sloped to 1.5:1. The railroad allowed volunteer vegetation to grow along the sloped walls following the trench's completion (Figure 6). In limited areas the railroad constructed concrete retaining walls to stabilize the trench embankment, such as between Pleasant and Nicollet Avenues (Figure 7). During grade separation construction efforts, two companies excavated and expanded lower levels to their existing buildings that were at the new grade of the rail line to provide direct access. One such building was the Western Alloyed Steel Casting Company building, located at 2848 Pleasant Avenue, was reconfigured with a lower level at the base of the trench. As such, the building itself forms the vertical plane of the grade separation trench (Figures 8 and 9).[11] The other building was the Twin Cities Separator Company building (nonextant), located at 2841 Dupont Avenue.

[11] The Western Alloyed Steel Casing Company building was determined noncontributing to the CM&StP Historic District due to alterations.

Figure 6. 1917 photograph of the 14th Avenue Bridge looking west with the newly constructed 29th Street to the south (left). Image from the City of Minneapolis Transportation Department photograph collection, courtesy of Gemini Research.

Figure 7. An original trench embankment retaining wall with original concrete parapet in the background and a new ashlar block retaining wall in the foreground, located between Pleasant and Nicollet Avenues. Mead & Hunt, 2015.

Figure 8. The Western Alloyed Steel Casting Company (foreground) c.1914, looking west toward the Grand Avenue Bridge, under construction. Photograph from "Views of the 29th Street Track Depression Construction Project in Minneapolis," annotated photograph album, Minnesota Historical Society.

Figure 9. The Western Alloyed Steel Casting Company Building, located at 2848 Pleasant Avenue. Mead & Hunt, 2015.

To provide for grade separation of vehicular and pedestrian traffic over the rail line, the CM&StP Railroad constructed 37 reinforced-concrete, tee beam bridges; a 38th bridge, located at Hennepin Avenue, was already in place.[12] The bridges were nearly identical in design but specifically engineered for length and abutment wall height at each individual location (Figures 10 and 11). The bridges featured modest Classical Revival-style detailing and included sidewalks and parapet railings. In most cases, bridges were three spans, though a longer bridge was required over the rail yard at 4th Avenue S.

Figure 10. First and Second Avenue Bridges in c.1920 looking east. Image from the City of Minneapolis Transportation Department photograph collection, courtesy of Gemini Research.

Figure 11. The Colfax Bridge after construction. Note the industrial building on the far right that serves as the embankment wall. Image from "Track Depression Work of the C.M. & St. P. Ry. at Minneapolis," Railway Review, July 17, 1915, 72.

[12] The Hennepin Avenue Bridge was replaced in 1980 and modified in 2000 with the addition of a bus station.

B. Alterations in the twentieth century

(1) 1917-1970

In the decades following the completion of the grade separation additional industries and commercial businesses were established along and near the rail line. As a result, the area took on even more industrial character. New industrial buildings were constructed adjacent to the line; some were built at the base of the trench with the building itself forming a trench wall. For example, in 1921 the Bruer Bros. Lumber Company constructed a manufacturing building at 2836 Lyndale Avenue, in which the building's lower level was at the railroad grade (Figure 12). In other instances, a company constructing a new building added a retaining wall within the trench. An example of a new building with a trench wall is the Eighth Ward Warehouse at 2900 Pleasant Avenue S (1919; addition 1927, Figure 13).

Figure 12. The Bruer Bros. Lumber Company Building, located at 2836 Lyndale Avenue S. Mead & Hunt, 2015.

Figure 13. The eastern portion of the Eighth Ward Warehouse, located at 2900 Pleasant Avenue S. Mead & Hunt, 2015.

Generally, the buildings constructed adjacent to and within the trench during this period were comprised of one- or two-story concrete or brick industrial buildings. The largest building along the rail line was the Sears, Roebuck & Company building at 2929 Chicago Avenue South. Constructed in 1928 and expanded in 1929, this National Register-listed building fills an entire city block and rises 12 stories with two three-story wings on the north (along the rail line) and south. During the 1920s grain elevators located along the rail line expanded with additional concrete bins and head houses. For example the Banner Grain Company (nonextant) replaced the original ironclad wood grain elevator between 10th and 11th Avenues with a new reinforced-concrete grain elevator. The new elevator, called the Stewart Grain Elevator (nonextant), was substantially larger than its predecessor with 42 concrete storage bins. In 1940 the elevator was again expanded with an annex elevator and office building (Figure 14).[13]

[13] Will Stark, *Minnesota Historic Property Record* "Stewart Grain Elevator (CEPRO Grain Elevator)," prepared for the State Historic Preservation Office and Federal Highway Administration (2003).

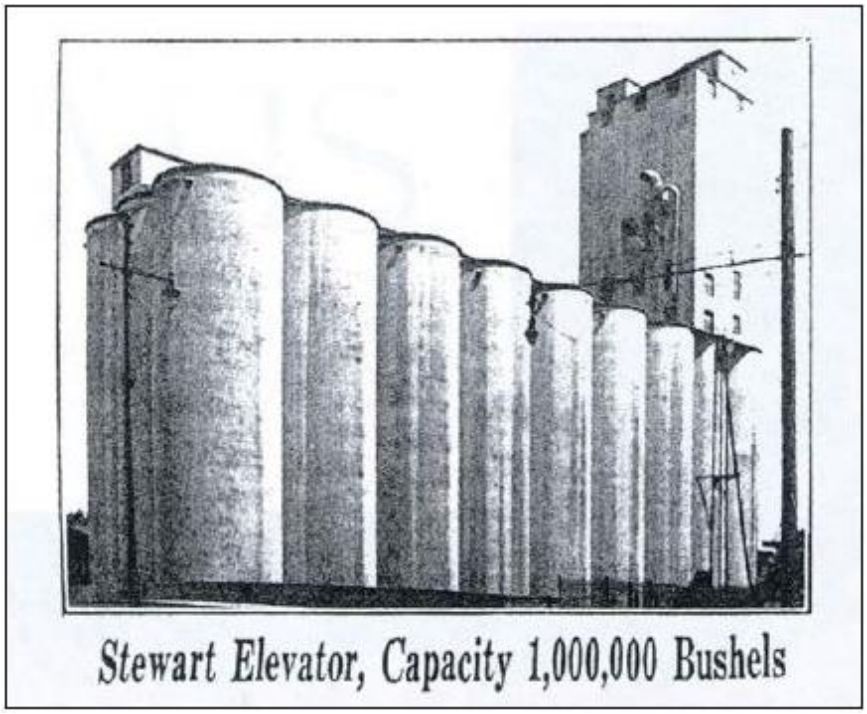

Figure 14. Stewart Grain Elevator, c.1930.[14]

The district retained its industrial character and remained largely unchanged from the 1930s through the mid-1960s, with few industrial buildings added, expanded, or replaced. The Norris Creameries Building (nonextant) constructed in 1946 at 2828 Emerson Avenue was the last industrial building constructed within the district that also formed a trench wall. The first major alteration to the original design of the grade separation came in 1967, when the state constructed Interstate (I-) 35W over the rail line just west of the 2nd Avenue Bridge. The new bridge was a wide, unadorned, steel structure with massive abutments that visually stood out from the repetition of the original reinforced-concrete bridges (Figure 15).[15] At the same time, all but the bridge abutments of the Clinton and 3rd Avenue Bridges were removed (Figure 16).

[14] Stark, 20.

[15] MnDOT proposes to replace the I-35W bridge in 2017. Work over the Midtown Greenway includes constructing a wider interstate bridge, an exit ramp, pedestrian bike/trail from the Greenway to Lake Street that runs parallel with Stevens Avenue, and a staircase from Stevens Avenue into the trench.

Figure 15. I-35W Bridge (1967). Mead & Hunt, 2015.

Figure 16. Bridge abutment for the former 3rd Avenue Bridge. Mead & Hunt, 2015.

In the 1970s a number of new buildings were erected adjacent to the rail line, including a new parking garage (2828 Hennepin Avenue S, Figure 17), a warehouse/storage facility (2837 Oakland Avenue S), and the Sears, Roebuck & Company warehouse addition (2800 10th Avenue S, Figure 18). The Sears, Roebuck & Company warehouse addition originally extended over the trench, essentially creating a block-long tunnel. The addition over the trench was removed in 2005.

Figure 17. Parking garage adjacent to the CM&StP Historic District, located at 2828 Hennepin Avenue S. Mead & Hunt, 2015.

Figure 18. Sears, Roebuck & Company 1970s warehouse (background), with adjacent park (former location of the Stewart Grain Elevator; foreground). Mead & Hunt, 2015.

(2) 1980-2004

Additional unadorned, single-story commercial and industrial buildings were erected adjacent to the rail line in the 1980s, including a car wash (2900 Nicollet Avenue South) and brick commercial building (2864 Chicago Avenue South). It was during the 1980s that five original grade-separation bridges were replaced. Replacements were made at Blaisdell (1982), 2nd (1982), Emerson (1986), Dupont (1987), and Lyndale Avenues (1987, Figure 19). Two additional bridges, located at Garfield (1992) and 4th Avenues (1997), were replaced in the following decade. Sometime between 1980 and 1991 one of the two grain elevators present during the period of significance, located between Garfield and Harriet Avenues, was demolished.

Figure 19. The Lyndale Avenue Bridge (1987). Mead & Hunt, 2015.

The predominantly industrial setting around the rail line persisted while the railroad line remained active. However, beginning in the mid-to-late 1990s the area around the railroad line began a distinctive transformation from largely industrial to residential use. For example, the large rail yard between 3rd and 5th Avenues was converted into an athletic field, two gardens, and a surface parking lot.

In 1993 the HCRRA acquired the rail line between Hiawatha and France Avenues for the purpose of constructing a light rail system. Under an agreement with the City in 1995, HCRAA permitted use of a portion of the trench for trail purposes. Soon after, in 1997, partnering agencies, including the HCRRA, Hennepin County, MnDOT CRU, and the City, prepared plans for the construction of the trail in the northern half of the trench; the southern half of the former railroad right-of-way was preserved for future transit use.

Work undertaken to transform the former rail line into a trail for bicycles and walking, known as the Midtown Greenway, commenced in 1999 and was largely completed in 2004.[16] The depressed railroad

[16] In total the northern 35 feet of the trench were reserved for trail purposes from France to the Mississippi River under an agreement between the HCRRA and the City of Minneapolis. Construction of the trail occurred in three

line was used until 2001. The rail-to-trail conversion was conducted west to east in two phases and included the following:

- Removal of the rail tracks, sidings, original buildings, trench retaining walls, and concrete slope paving
- Construction of a retaining wall to elevate the trail between Humboldt and Stevens Avenues;
- Installation of a chain-link fence along the length of the constructed elevated trail;
- Erection of seven ashlar and concrete block access ramps to provide access from the street level into the trench; and
- Addition of trail amenities, including staircases, lighting, benches, emergency beacons, and wayfinding signage (Figures 20-22).

Additional changes were associated with adjacent land redevelopment. The remaining grain elevator, located between 10th and 11th Avenues, was demolished in 2004 (replaced with a public open space c.2007). Two pedestrian bridges were added by private developers in 2004: one at Girard Avenue and one between Elliot and 10th Avenues (Figure 23).

Figure 20. The Midtown Greenway, looking east from Dupont Avenue towards Colfax Avenue. Mead & Hunt, 2015.

Phases: France to 5th Avenue in 1999; 5th Avenue to Hiawatha Avenue in 2003-2004; and Hiawatha Avenue to the Mississippi River in 2006. Only portions of trail construction in Phase I and II occurred within the district boundary.

Figure 21. Elevated trail between Nicollet and Stevens Avenues. The use of a retaining wall to elevate the trail significantly alters the original grade of the rail corridor. Mead & Hunt, 2015.

Figure 22. One of seven access ramps from the street into the trench; this one is located between 17th and 18th Avenues. Access ramps like this one extend the length of the block and take up approximately one-third of the trench width. Additionally, the concrete block construction of the access ramp create a new trench wall where there was none historically. Mead & Hunt, 2015.

Figure 23. Pedestrian bridge at Girard Avenue (c.2004). Mead & Hunt, 2015.

C. What the district looks like today (2005-present)

Since 2005 changes have occurred adjacent to and within the boundary of the district. Adjacent changes impact the character and setting. Within the district boundary, bridge replacements at Park and Chicago Avenues and the addition of wingwalls to the 10th and 11th Avenue Bridges have occurred. Other substantial changes within the district boundary include the construction of large terraces with staircases accessing the trail (Figure 24) and a new apartment complex at Cedar Avenue (Figure 25). Smaller additions within the district's boundary include landscaping plantings, retaining walls, and patios.

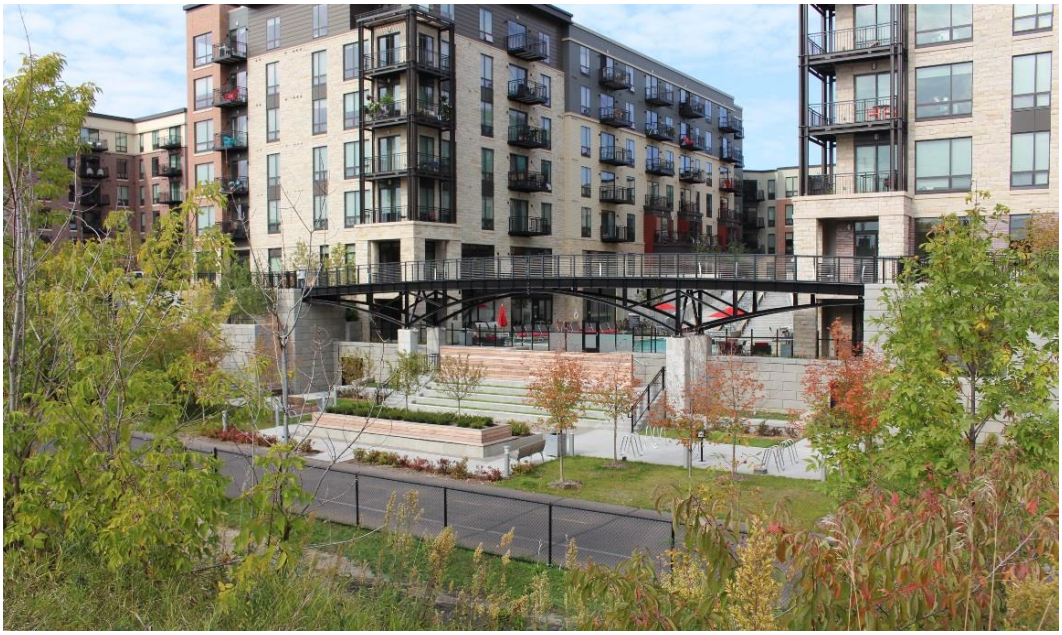

Figure 24. The terrace between Emerson and Dupont Avenues, completed 2015, is located inside the district boundary. The multi-story apartment complex in the background is directly adjacent to the district. Mead & Hunt, 2015.

Figure 25. 2005 apartment complex located within the CM&StP Historic District boundary at 2850 Cedar Avenue. Mead & Hunt, 2015.

The popularity of the trail has resulted in the redevelopment of lots adjacent to the district. A number of the historic industrial buildings and residential homes located within the western portion of the district and directly adjacent to Midtown Greenway have been demolished and replaced with five- to seven-story apartment/condominium or hotel buildings (Figures 26 and 27). The majority of these buildings were erected between 2007 and 2015. In some instances, the new building removed original trench walls or added a new wall where one had not historically been.

Figure 26. View of the north side of the trench between Girard and Emerson Avenues with newly constructed apartment complexes where industrial buildings once stood. Mead & Hunt, 2015.

Figure 27. New apartment complex between Bloomington and 16th Avenues. Mead & Hunt, 2015.

D. Number of resources

A reassessment of the number of resources within the property was undertaken as part of the reevaluation of the district's historic integrity. The review was in response to both demolition and addition of resources since the time of the National Register Nomination. In addition, the Nomination listed many large-scale structures found within the trench as "minor" features within the district, which should be considered in the resource count per National Register guidance. Resources located within the district boundary either contribute or do not contribute to the historic significance of the district. Therefore, having an accurate picture of type, number, and character of resources within the district is an important element to understanding if the district retains historic integrity.

Following the guidance presented in the National Register Bulletin *How to Complete the National Register Registration Form*, including "Rules for Counting Resources," Mead & Hunt historians categorized contributing and noncontributing buildings, sites, structures, and objects within the district. The results are indicated in Table 2. A corresponding table, found in Appendix C, provides additional information including classification, location information, date of construction, contributing/noncontributing status, and whether it was included in the original Nomination's resource count. This background allows a comparison between the number of resources within the Nomination and the current resource count and helps to define the overall character of the district.

Table 2. Reassessment of the number of resources within the property (2016)

Resource	Contributing	Description	Noncontributing	Description
Buildings	0		11	Buildings within the district boundary and/or comprise the trench wall
Sites	0		1	Former rail yard (altered)
Structures	28	Grade separation trench	30	Elevated trail with retaining wall

Table 2. Reassessment of the number of resources within the property (2016)

Resource	Contributing	Description	Noncontributing	Description
		25 bridges		New trench retaining walls (counted as one resource)
		29th Street (between 10th and Cedar Avenues)		
		Original trench retaining walls (counted as one resource)		Staircase
				17 bridges
				7 ramps
				3 terraces
Objects	0		0	
Total	**28**		**42**	

Certain rules for counting resources identified in the National Register Bulletin were of particular note for the CM&StP Historic District and their application to the district's resource count is discussed below:[17]

- "Count all buildings, structures, sites, and objects located within the property's boundaries that are **substantial in size and scale**. Do not count minor resources, such as small sheds or grave markers, unless they strongly contribute to the property's historic significance."

  For the CM&StP Historic District, the following were counted:

  - Bridges traversing the trench were counted as individual structures.
  - Access ramps, which extend the length of the block, were counted as individual structures.
  - Buildings constructed within the district boundary and those sharing or comprising a trench wall were counted as individual buildings.
  - The elevated trail with an ashlar block retaining wall that extends approximately one-half of the district's length was counted as one structure.
  - Large terraces, which include substantial staircases and retaining walls, were counted as individual structures.
  - A large, freestanding stairway at 12th Avenue, constructed to provide additional access into the trench, was counted as a structure.
  - 29th Street, between 10th and Cedar Avenues, was counted as one structure.
  - Original trench retaining walls were included as one structure.

[17] National Park Service, *National Register Bulletin: How to Complete the National Register Registration Form*, 17.

- Newly constructed trench retaining walls, where none were historically, were included as one structure (Figure 28).

- Former rail yard, spanning from 3rd to 5th Avenues, was included as one site.

Figure 28. Example of a new trench retaining wall where none was historically, located between Hennepin and Freemont Avenues. Mead & Hunt, 2015.

- "Count gardens, parks, vacant lots, or open spaces as 'sites' only if they contribute to the significance of the property."

  For the CM&StP Historic District, the approach was as follows:

  - A parking lot located within the district boundary was not included in the resource count because it was constructed after the period of significance, is not substantial in scale, and does not contribute to the district's significance.

  - Only a small portion of a garden and park are included in the district boundary. These sites do not contribute to the significance of the property, are not substantial in scale, and are not included in the resource count.

  - Landscaping planting areas are located throughout the district and are largely comprised of small stands or 3-4 ornamental deciduous trees, native planting areas, or volunteer vegetation. A larger stand of trees is located at the eastern end of the corridor between Cedar and 28th Street. Landscaping areas were not included in the resource count as sites because they do not contribute to the significance of the district, are not substantial in scale, and are temporal in nature.

- "Do not count landscape features, such as fences and paths, separately from the site of which they are part unless they are particularly important or large in scale, such as a statue by a well-known sculptor or an extensive system of irrigation ditches."

  For the CM&StP Historic District, the approach was as follows:

  - Original and replacement fencing and small retaining walls were not included in the resource count because they are not large or extensive and do not contribute to the significance of the district.

  - Small-scale features, such as lighting, emergency call boxes, way finding signs, and utilities, were not included in the resource count because they are not substantial in size and do not contribute to the significance of the district.

E. Assessment of historic integrity

Mead & Hunt historians undertook a reconsideration of historic integrity to provide additional perspective on the eligibility of the historic district beyond the partial view offered by the updated property resource count. This reevaluation is based upon physical changes to the district that have occurred since the district's period of significance.

The 2.8-mile grade separation district is comprised of 43 blocks, with each block bracketed by bridges to the east and west. When reviewing historic integrity for a district, "the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships amongst the district's components must be substantially unchanged since the period of significance."[18] Applying this consideration, the historic integrity of both the component blocks and the whole of the district was assessed.

There are seven aspects of historic integrity to consider when evaluating a property, as follows:[19]

- *Location* is the place where the historic property was constructed or the historic event occurred.

- *Setting* is the physical environment of the historic property.

- *Feeling* is the property's aesthetic or historic sense of a particular period of time.

- *Association* is the direct link between a historic event and the property.

- *Design* is the combination of elements that create the physical form, plan, space, structure, and style of a property.

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[18] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Washington, D.C., National Park Service, 1991, rev), http://www.nps.gov/nr/publications/bulletins/nrb15/, 46.

[19] Aspects of integrity and how to evaluate the integrity of a property are discussed in National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 44.

- *Workmanship* is the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory.

- *Materials* are the physical elements that were combined or deposited during a particular period of time and in a particular patter or configuration to form a historic property.

(1) District's essential physical features and aspects of integrity

While it is ideal for a property to retain all seven aspects of integrity, per NPS guidance, "each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features."[20] The National Register Bulletin states additionally that: "All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity."[21] In order to assess integrity of the CM&StP Historic District, Mead & Hunt historians started with an understanding of its significance and identification of its essential physical features. Essential physical features are "those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance)." They are the elements within the district that must "be present for a property to represent its significance."[22]

The CM&StP Historic District is listed in the National Register under *Criterion A* in the area of Community Planning and Development. The district's period of significance is 1912-1916, which corresponds to the construction of the trench and grade-separation structures.[23] The construction of the grade separation was the outcome of a multi-year legal negotiation between the public and the CM&StP Railroad to increase public safety through the separation of rail and pedestrian and vehicular traffic from the CM&StP rail line. As such, the essential physical features that describe the "*why"* and "*when"* the district is significant include the series of grade-separation structures and the trench, including the sloped earthen trench embankment and those retaining walls and buildings that comprise the trench walls (Figure 29).[24]

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[20] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 48.

[21] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 46. The SHPO's letter of September 9, 2016, cites this passage (see Appendix D for a copy of this letter).

[22] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 46.

[23] Reevaluation of the district's period of significance was not undertaken as part of this project; however, the SHPO suggested revision to the period of significance may be warranted. Because most changes to and additions within the district occurred from the 1970s to the present, revision of the district's period of significance would have limited impact to the overall resource counts and historic integrity.

[24] In a September 9, 2016, letter, the SHPO agrees that these are the essential physical features of the district.

Figure 29. The grade-separation structures and sloped embankment walls are essential physical features. Mead & Hunt, 2015.

The seven aspects of integrity were reviewed for how they related to the district's essential physical features. The following was considered:

- *Location* – Integrity of location is an important aspect because the construction of the grade separation occurred in direct response to the growth of Minneapolis around an existing rail corridor and the safety issues that stemmed from its urban location.
    - Integrity of location is conveyed throughout the 2.8-mile length of the grade separation.

- *Association* – Integrity of association is directly linked to physical improvements made through the construction of a grade separation structure in the interest of safety. This aspect of integrity is often tied to integrity of feeling.
    - Association would be conveyed through continued industrial transportation use.

- Design – This aspect of integrity represents the construction of the grade separation, including the bridges that provided safe crossings over the rail line. Integrity of design is tied to workmanship and materials; these aspects can be looked at together, as they allow a structure to convey the physical features that characterize its type, period, and method of construction.
    - Integrity of design is represented through grade-separation structures and the trench, including embankment and reinforced-concrete walls and those buildings that comprise the trench wall.

- Workmanship – Workmanship is the artistry and skill evidenced in the construction of the trench walls and grade-separation structures, often expressed through the overall design of the property and the materials used to construct it.
    - Evidence of workmanship is conveyed in the bridges and trench walls.

- Materials – Materials are the physical embodiment of the property's design and the elements by which workmanship is conveyed.
    - The material used for grade-separation structures and trench walls was reinforced concrete, a readily available and inexpensive building material.

- Feeling – This aspect of integrity is generally expressed by the presence of elements that evoke and express the historic character during the period of significance. These elements provide association with the district's significance.
    - Feeling would be conveyed through the industrial character of the grade separation including rail tracks, embankments, and sidings serving adjacent industrial properties.

- Setting – This aspect of integrity relates to the district's physical environment.
    - The district's significance would be conveyed through the physical separation of rail traffic from vehicular/pedestrian traffic (still present) and the industrial properties along the trench.

Based on the district's significance under *Criterion A* and its essential physical features of grade-separation structures and the trench, Mead & Hunt historians considered location, association, and design to be the most important aspects of integrity for the district. Workmanship, materials, feeling, and setting are less important aspects of integrity when considering the district's expression of historic significance.[25]

(2) Block-by-block review of integrity

In order to understand how alterations impact the district's historic integrity, the project historians completed a block-by-block assessment of each of the aspects of integrity.[26] Each block was reviewed taking into account changes that have occurred outside the period of significance (1912-1916).[27] The National Register Bulletin states: "A component of a district cannot contribute to the significance if it has been substantially altered since the period of the district's significance." [28]

Aspects of integrity were evaluated based on the following methodology:

- For all blocks, integrity of location is retained.

[25] In its letter of 9 September 2016, the SHPO agrees that setting is not an aspect of integrity "paramount to understanding the significance of the district."

[26] According to its September 21, 2016, letter to MnDOT (see Appendix D), the SHPO also applied the method of parceling the linear district into segments and reviewing each segment individually and drawing a conclusion as to whether or not the subject segment "contributed" to the historic district.

[27] The SHPO took a fundamentally different approach to its review of integrity. Specifically, reviewers "asked what has changed since the property was listed in 2005." The SHPO noted its understanding was bound to 36 CFR 60.15(a)(1), which is one of four reasons a property may be removed from the National Register.

[28] National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* 46.

- Integrity of association is lost in all blocks because the tracks and sidings have been removed throughout the industrial transportation corridor and the former rail bed has been transformed to a recreational trail. The separation of pedestrians and vehicles at street level from the rail line carrying railroad traffic below grade is no longer extant and the visual association no longer present. Additionally, integrity of association is lost through the removal of the former rail yard between 3rd and 5th Avenues. Because integrity of feeling and association are closely linked, integrity of feeling is also lost.[29]

- Integrity of design is compromised in a block if essential physical features have been altered, removed, or replaced.
    - Integrity of design is diminished within a block through the following impacts:
        - Alteration to an original bridge, including its removal, replacement, or addition of wingwalls.[30]
        - Construction of an elevated trail extending between Humboldt and Stevens Avenues, which results in a change to the historic grade separation depth. The elevated trail is comprised of an ashlar block retaining wall, rising up to 15 feet tall, and chain-link fencing.
        - Addition of a large terrace with integrated retaining walls and staircases.
        - Addition of new surface materials for athletic field and parking lot at former rail yard location.
    - Integrity of design is lost within a block when the following occurs:
        - Both original bridges within the block are nonextant.
        - An access ramp extends the length of the block. Access ramps occupy approximately one-third of the trench's width and represent a new or replacement trench wall.
        - An original trench wall is replaced or removed.
        - A trench wall is added where none was historically.
        - Two or more alterations are combined, such as the presence of the elevated trail with retaining wall and one bridge replacement or the presence of a large terrace and one bridge removal.

[29] The removal of these resources occurred prior to the Nomination and were not considered an impact to the district's integrity of association and feeling at that time.

[30] The SHPO considers new bridges reviewed under Section 106 as contributing to the district as indicated in a September 21, 2016, letter from SHPO to MnDOT (see Appendix D). However, MnDOT CRU regards replacement bridges as negatively impacting the historic integrity of the district.

  - If integrity of design is lost in a block, integrity of workmanship and materials is also lost due to the tie between these three aspects of integrity.

- Integrity of setting is lost in blocks where original industrial buildings have been demolished and where new multi-story residential complexes, parking structures, or other buildings (school, warehouse, or hotel) have been constructed, and where the interstate has bisected the district.

- If the block retains most aspects of integrity the block retains overall integrity.

Table 3 shows the findings based on the block review. The table indicates alterations and how they impact each block's integrity. The maps that follow Table 3 were created to visualize both the district overall and each block. Current photographs included within the map show existing conditions and can be compared to the historic photographs in Section 2. These comparisons informed the findings that are recorded in Table 3.

As was evidenced through a block-by-block review of the corridor, specific areas within the district retain substantial historic integrity while others do not. Blocks in the eastern third of the district are largely unaltered and best convey the district's significance; conversely, considerable redevelopment and alteration of the district's essential features has resulted in a loss of most aspects of integrity within the western third of the district.

Table 3. Block-by-block integrity assessment of the CM&StP Historic District

Block # (see map)	Alterations	Aspect of integrity							Block retains overall integrity?
		Location	Design	Association	Feeling	Setting	Workmanship	Materials	Yes/No
1	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes
2	Bridge replacement (with bus enclosure); gradual elevation change to max of 2 feet as retaining wall begins mid-block; parking ramp within setting	Yes	Yes	No	No	No	Yes	Yes	Yes
3	Ramp extends the length of the block; bridge replacement (with bus enclosure); pedestrian bridge addition; retaining wall where not present originally; elevated trail with retaining wall; new parking structure and bus depot within setting	Yes	No	No	No	No	No	No	No
4	Retaining wall where none historically; pedestrian bridge addition; elevated trail; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
5	One replacement bridge; elevated trail with retaining wall; former building within district boundary now nonextant; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
6	Large terrace intrusion into trench; elevated trail with retaining wall; two bridge replacements; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
7	One bridge replacement; elevated trail with retaining wall; former building within district boundary now nonextant; partial retaining wall where not present originally; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
8	Ramp extends the length of the block; elevated trail with retaining wall; new multi-story residence within setting	Yes	No	No	No	No	No	No	No

Table 3. Block-by-block integrity assessment of the CM&StP Historic District

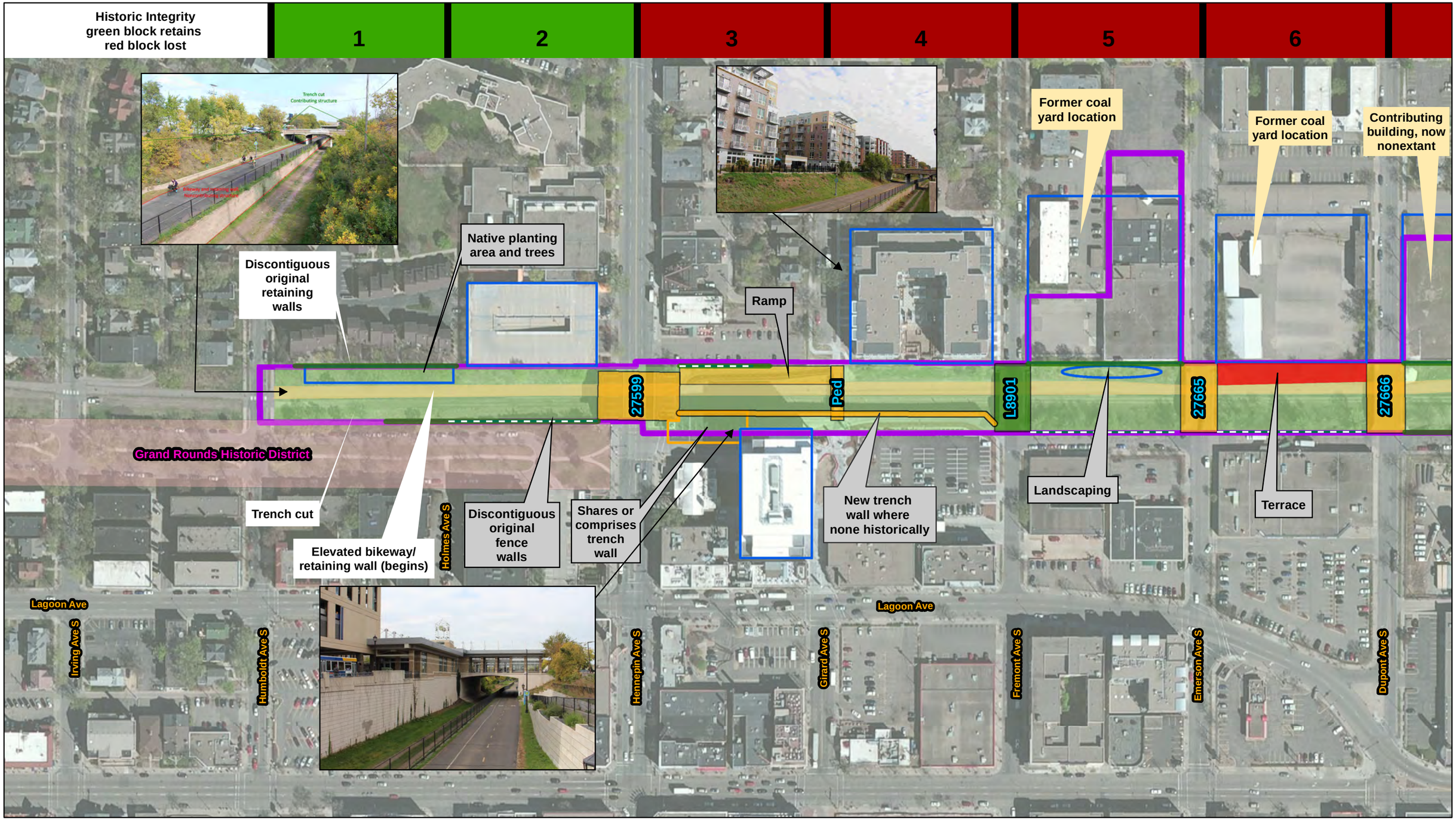
Block # (see map)	Alterations	Aspect of integrity							Block retains overall integrity?
		Location	Design	Association	Feeling	Setting	Workmanship	Materials	Yes/No
9	Ramp extends the length of the block; elevated trail with retaining wall; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
10	Elevated trail with retaining wall; one bridge replacement	Yes	No	No	No	Yes	No	No	No
11	Two bridge replacements; terrace intrusion into trench (original trench wall nonextant); elevated trail with retaining wall; new multi-story residence within setting	Yes	No	No	No	No	No	No	No
12	One bridge replacement; elevated trail with retaining wall; large garden where grain elevator historically stood	Yes	No	No	No	No	No	No	No
13	Elevated trail with retaining wall	Yes	Yes	No	No	Yes	Yes	Yes	Yes
14	Elevated trail with retaining wall	Yes	Yes	No	No	Yes	Yes	Yes	Yes
15	Elevated trail with retaining wall	Yes	Yes	No	No	Yes	Yes	Yes	Yes
16	Elevated trail with retaining wall; one bridge replacement	Yes	No	No	No	Yes	No	No	No
17	Ramp extends the length of the block; one bridge replacement	Yes	No	No	No	Yes	No	No	No
18	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes
19	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes
20	One bridge replacement; new bridge (Interstate)	Yes	No	No	No	No	No	No	No
21	Removal of original bridge (not replaced); new bridge (Interstate)	Yes	No	No	No	No	No	No	No
22	Removal of original bridges (abutments remain); garden where former rail yard was located	Yes	No	No	No	No	No	No	No

Table 3. Block-by-block integrity assessment of the CM&StP Historic District

Block # (see map)	Alterations	Aspect of integrity							Block retains overall integrity?
		Location	Design	Association	Feeling	Setting	Workmanship	Materials	Yes/No
23	Removal of original bridge; one bridge replacement; athletic field where former rail yard was located; new multi-story parking ramp and school within setting	Yes	No	No	No	No	No	No	No
24	One bridge replacement; parking lot where former rail yard was located; multi-story warehouse within setting; small surface parking lot within district boundary	Yes	No	No	No	No	No	No	No
25	Garden where former rail yard was located	Yes	Yes	No	No	No	Yes	Yes	Yes
26	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes
27	Ramp intrusion into trench; one bridge replacement	Yes	No	No	No	Yes	No	No	No
28	One bridge replacement	Yes	Yes	No	No	Yes	Yes	Yes	Yes
29	One bridge replacement	Yes	Yes	No	No	Yes	Yes	Yes	Yes
30	One bridge replacement; large terrace intrusion into trench; multi-story hotel within setting	Yes	No	No	No	No	No	No	No
31	Bridges altered with added wingwalls; pedestrian bridge addition; multi-story warehouse within setting	Yes	No	No	No	No	No	No	No
32	Bridges altered with added wingwall; large park where grain elevator historically stood within setting; new multi-story parking garage within setting	Yes	No	No	No	No	No	No	No
33	Bridges altered with added wingwall; original trench wall nonextant	Yes	No	No	No	Yes	No	No	No
34	Large wooden staircase (easily removable)	Yes	Yes	No	No	Yes	Yes	Yes	Yes
35	Ramp extends the length of the block	Yes	No	No	No	Yes	No	No	No
36	Partial ramp intrusion into trench	Yes	Yes	No	No	Yes	Yes	Yes	Yes

Table 3. Block-by-block integrity assessment of the CM&StP Historic District

Block # (see map)	Alterations	Aspect of integrity							Block retains overall integrity?	
		Location	Design	Association	Feeling	Setting	Workmanship	Materials	Yes/No	
37	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes	
38	New multi-story residence within setting	Yes	Yes	No	No	No	Yes	Yes	Yes	
39	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes	
40	Ramp extends the length of the block	Yes	No	No	No	Yes	No	No	No	
41	New multi-story residence within district boundary	Yes	Yes	No	No	No	Yes	Yes	Yes	
42	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes	
43	No changes/alterations	Yes	Yes	No	No	Yes	Yes	Yes	Yes	
Totals									19	24



Legend

- Noncontributing Buildings, Pre-2005
- Noncontributing Buildings, 2005-2015
- Not included in resources count (includes fencing, gardens, athletic fields, parks, and setting)
- Noncontributing Site, Pre-2005
- Noncontributing Structures, 2005-2015
- Contributing Structures, 1912-1916
- Noncontributing Structures, Pre-2005
- National Register property
- Midtown Greenway Boundary

Example	Included in Nomination Resource Count
Example	Not in Nomination Resource Count
Example	Information only

CM&StP Railroad Grade Separation Historic District Reevaluation
May 2016

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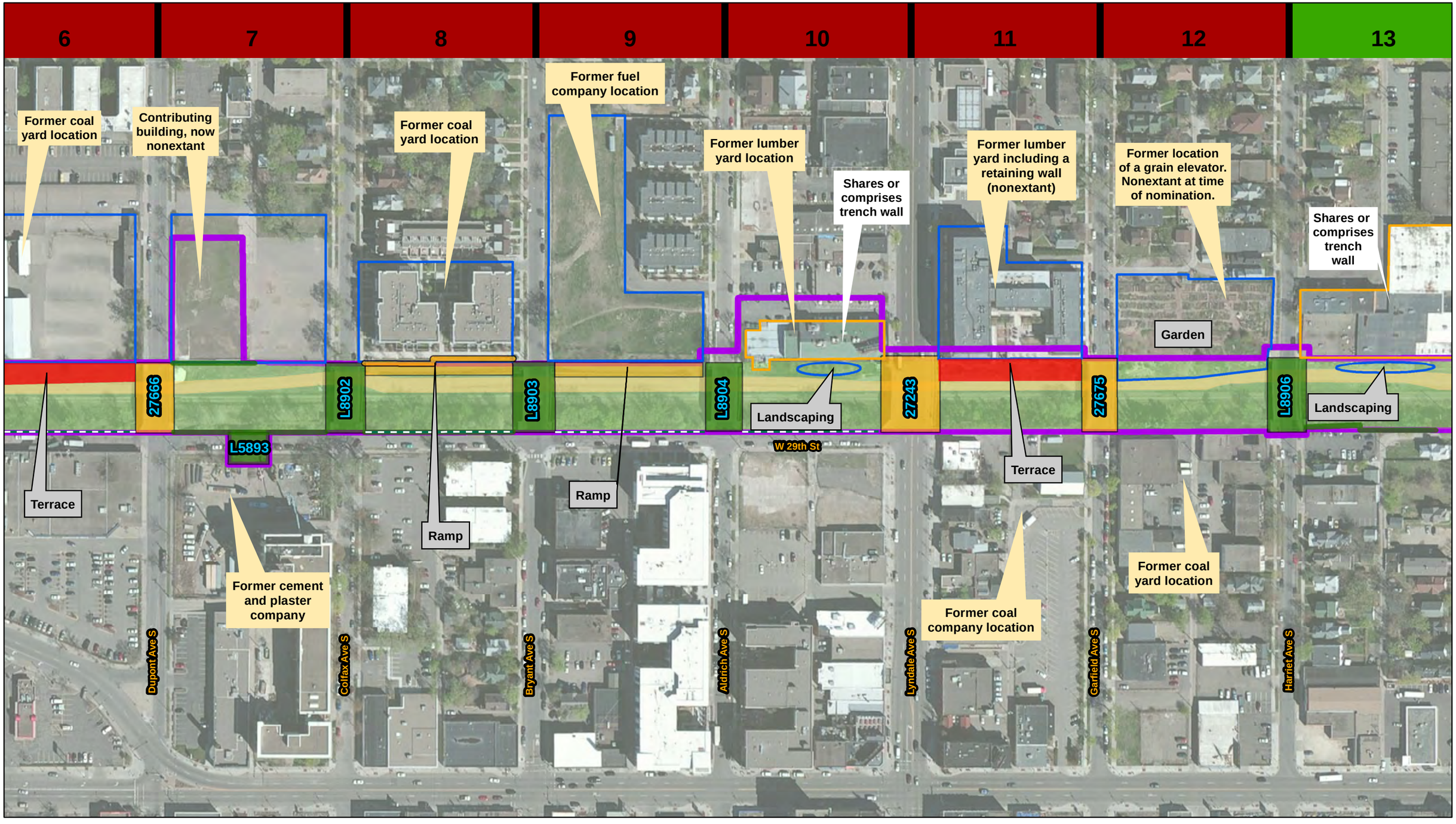

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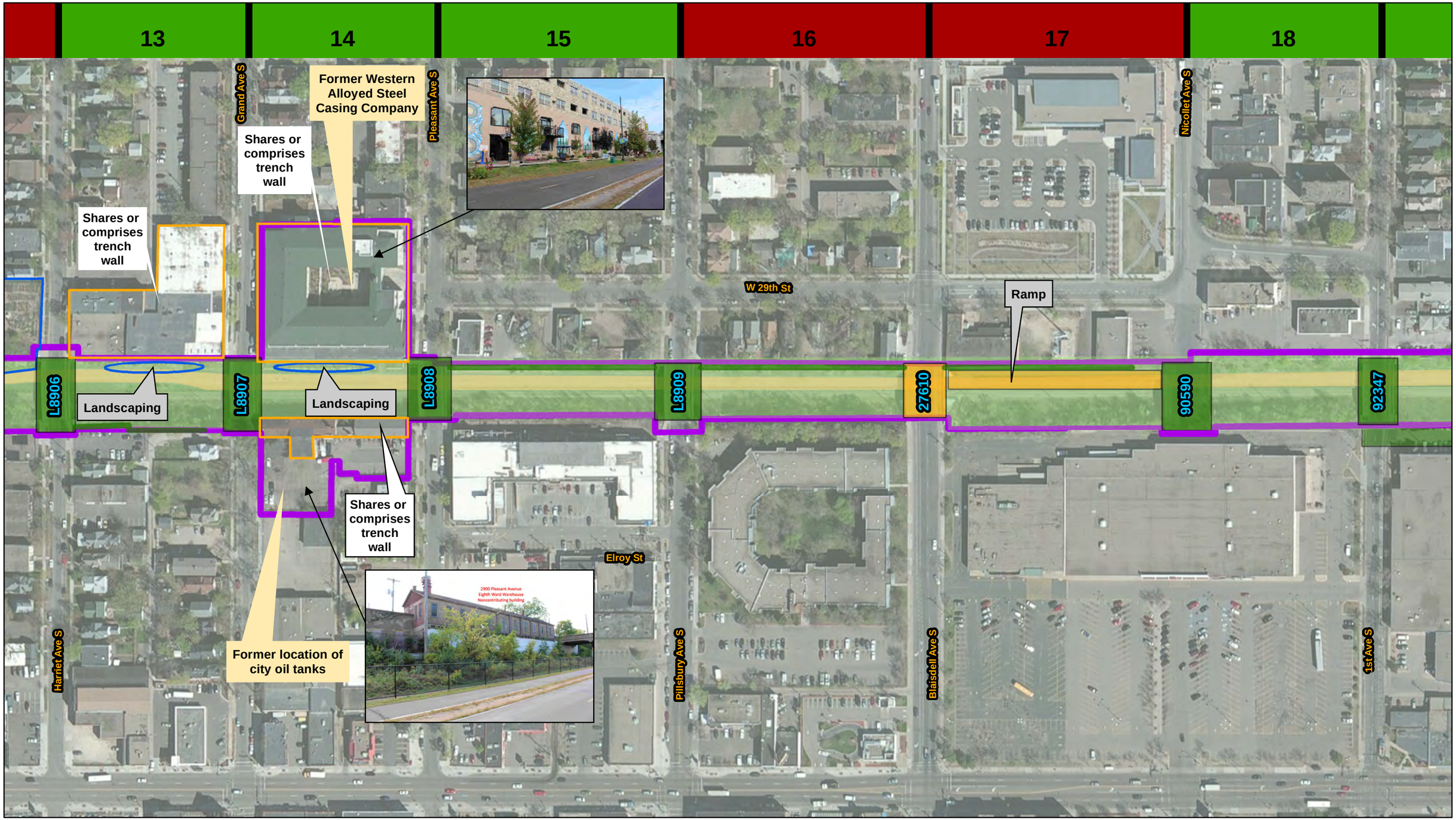

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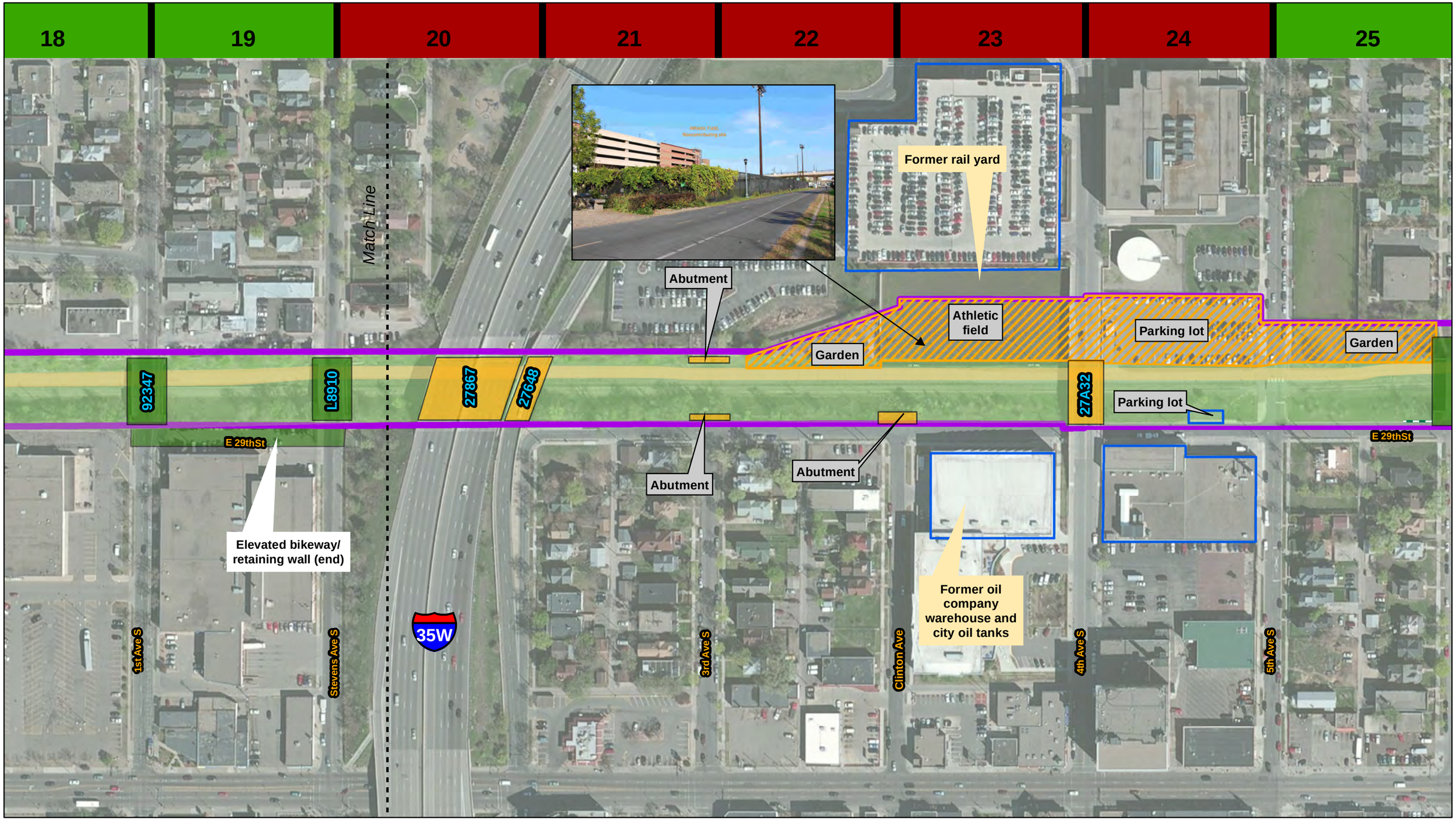

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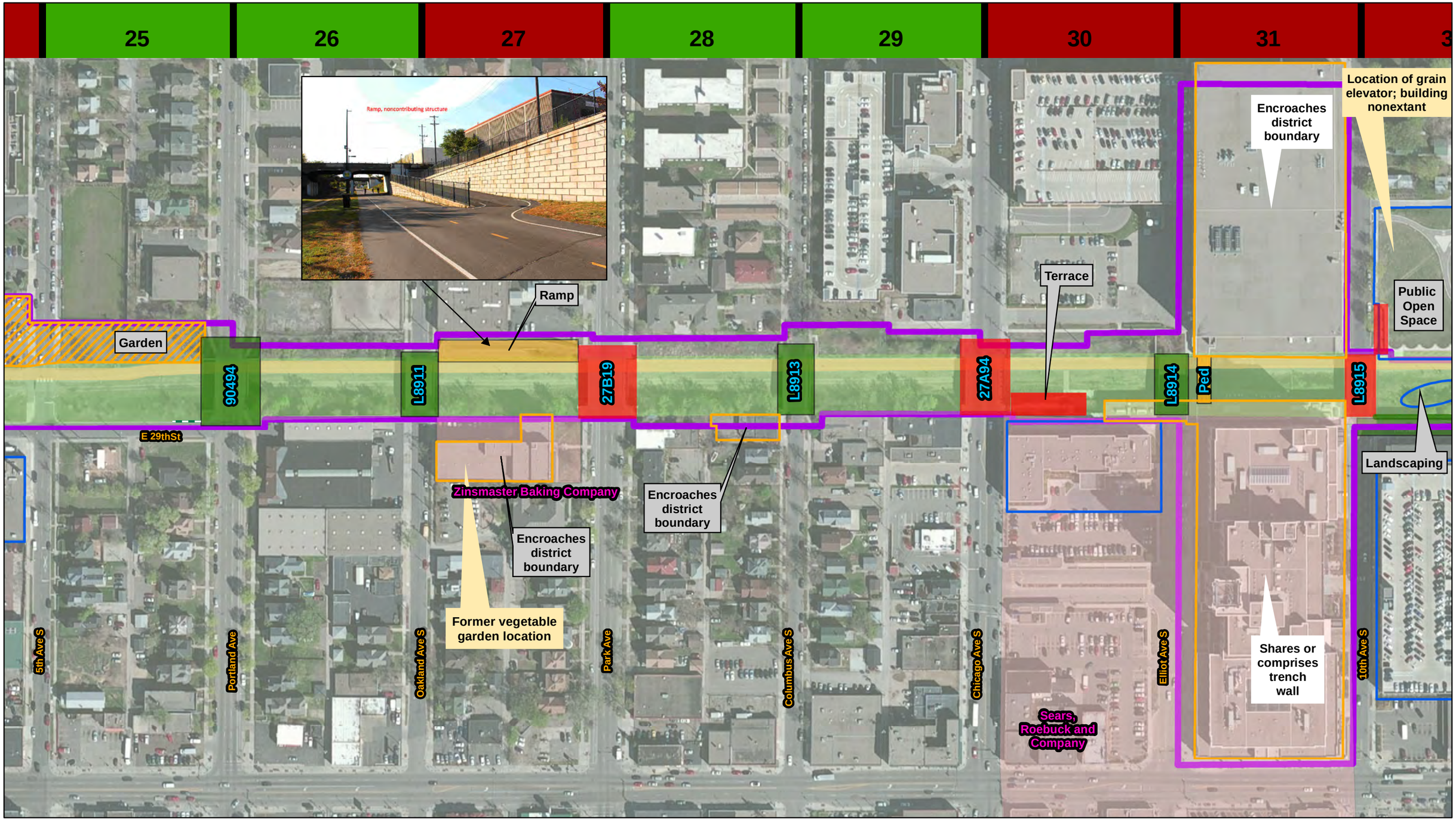

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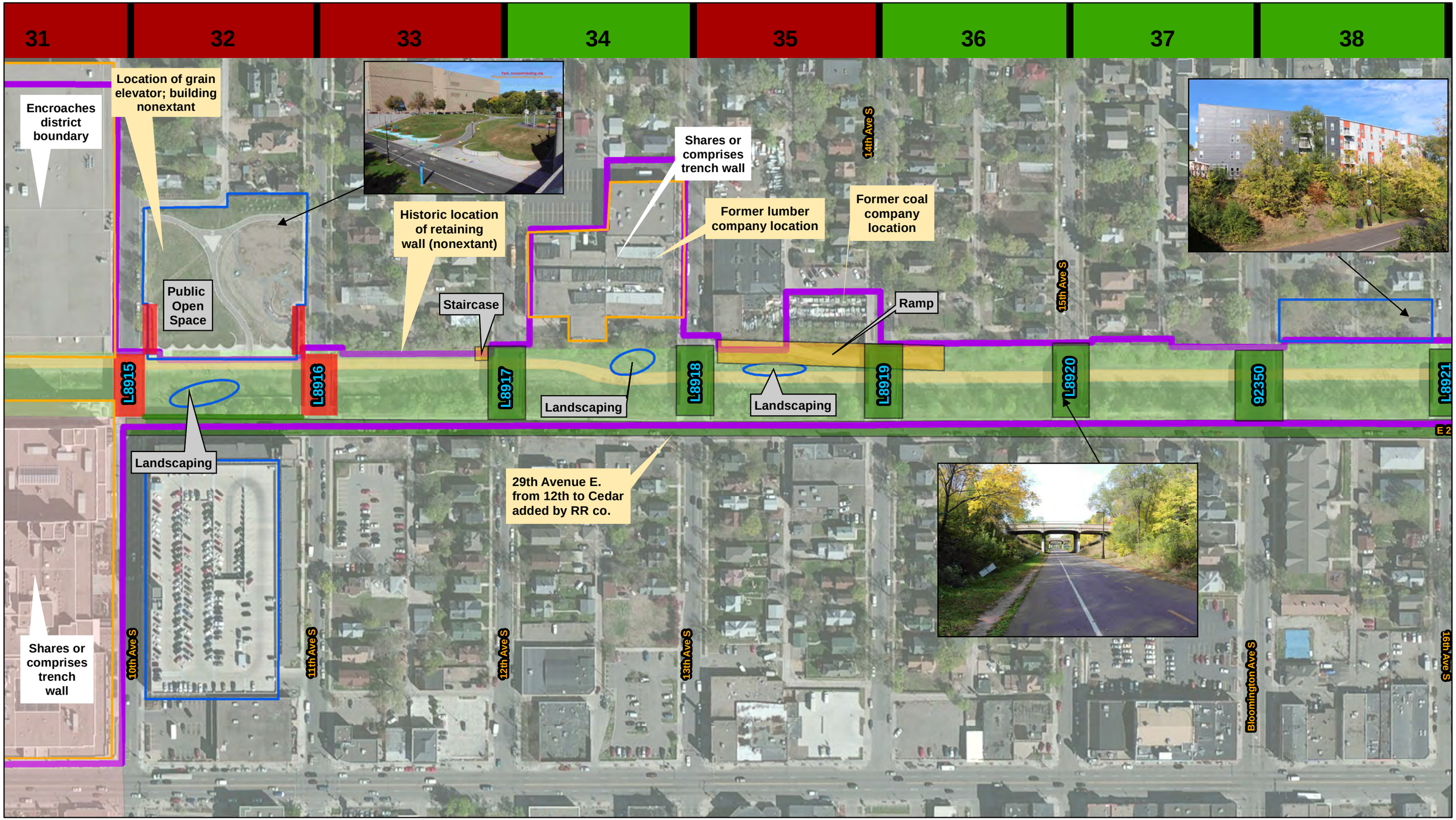

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Example Included in Nomination Resource Count

Example Not in Nomination Resource Count

Example Information only

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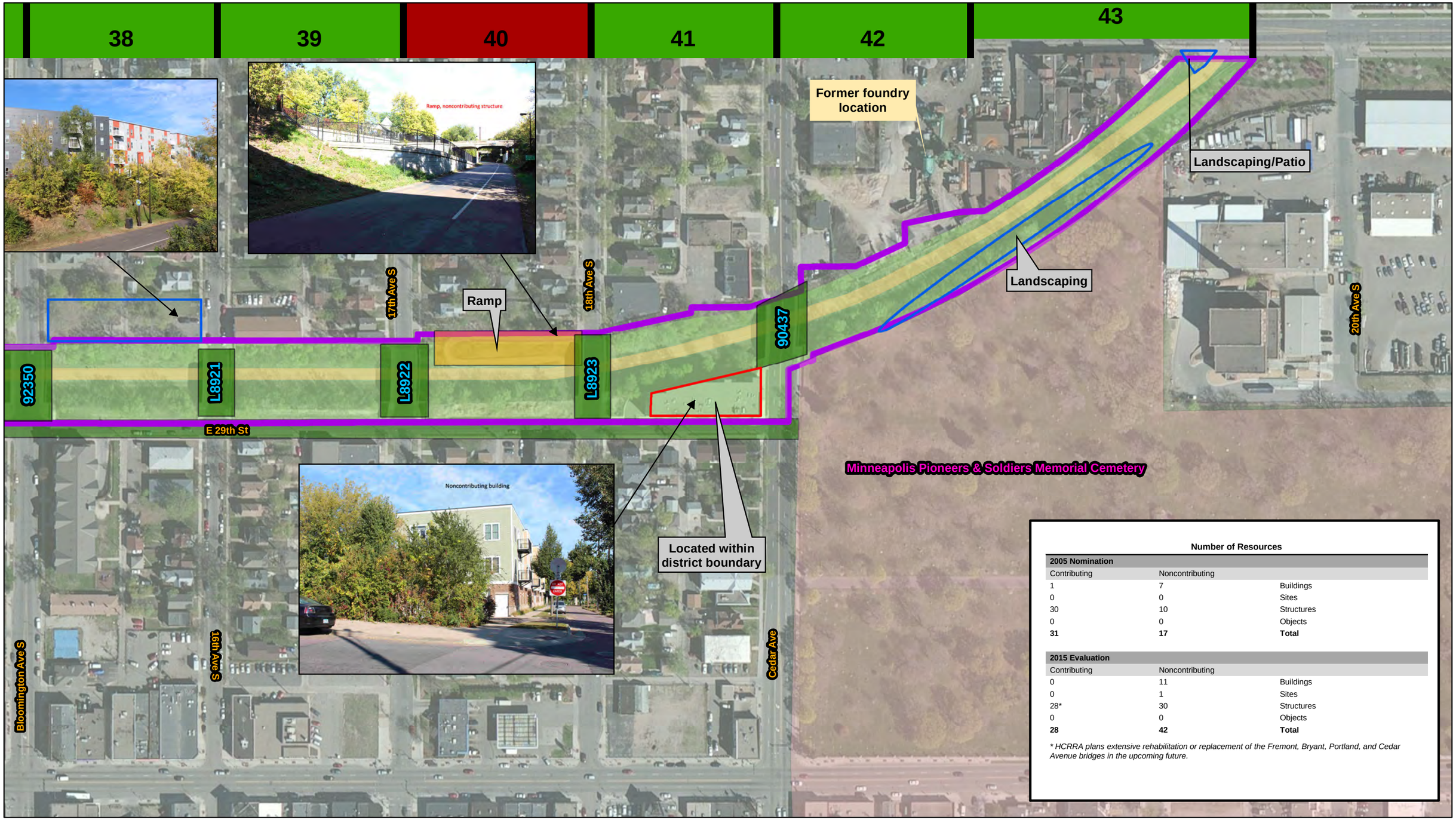

Number of Resources

2005 Nomination		
Contributing	Noncontributing	
1	7	Buildings
0	0	Sites
30	10	Structures
0	0	Objects
31	**17**	**Total**

2015 Evaluation		
Contributing	Noncontributing	
0	11	Buildings
0	1	Sites
28*	30	Structures
0	0	Objects
28	**42**	**Total**

** HCRRA plans extensive rehabilitation or replacement of the Fremont, Bryant, Portland, and Cedar Avenue bridges in the upcoming future.*

Legend

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3. Recommendations

This report fulfills MnDOT CRU's request to reevaluate the historic integrity of the CM&StP Historic District, taking into account recent changes to the district and its setting, for the purpose of considering the appropriateness of delisting the district. Mead & Hunt historians prepared an analysis and recommendations based on research and field investigations conducted in 2015-2016 that identified current conditions, resources, features, and alterations, applying professional judgment and NPS guidelines.

Regulatory requirements provide the impetus for this reevaluation report. Section 106 requires federal agencies and owners seeking federal assistance to take into account the effects of their undertakings on historic properties, and affords the Advisory Council on Historic Preservation a reasonable opportunity to comment on such undertakings. FHWA has delegated its responsibility under Section 106 to MnDOT CRU. MnDOT CRU consults with the SHPO, and others, when considering these effects. Review under Section 4(f) is required when the proposed undertaking constitutes a "use" of a historic site.[31] Before approving such a use, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) property and that the project includes all possible planning to minimize harm; or, FHWA makes a finding that the project has a de minimis impact on the Section 4(f) property.

Regulations that implement the NHPA assign roles to the SHPO in both National Register Nominations and Section 106 compliance. Due to these responsibilities, MnDOT CRU consulted with the SHPO in undertaking this reevaluation. On February 19, 2016, MnDOT CRU submitted a draft of this CM&StP Historic District reevaluation report to the SHPO for review and comment. On May 5, SHPO provided initial comments which, in particular, noted procedural requirements of delisting. On June 9, MnDOT CRU, SHPO and Mead & Hunt historians met to discuss comments and next steps. In August, MnDOT CRU provided SHPO clarifications that Mead & Hunt was able to gather regarding construction sequences in the Midtown Greenway. On September 16, SHPO provided its comments on the draft report, disagreeing on aspects of the methodology and concluding that the district retains sufficient integrity to remain listed. The reevaluation of segments was an approach shared by SHPO and MnDOT CRU's consultants, though for certain segments different conclusions were reached. These discussions and comments were taken into account in preparation of the final version of this report, and served to inform the recommendations presented. Referenced memos and correspondence are included in Appendix D.

A. Considerations for delisting the district from the National Register

MnDOT CRU requested Mead & Hunt historians explore the appropriateness of de-listing the district based on the district's diminished integrity. The historians considered the specific NPS guidance for the removal of a property from the National Register. Four options for de-listing are presented as follows:

[31] Section 4(f) review is also required for trails and bridges. Transportation facilities, including bridges, are not reviewed for Section 4(f) unless the project poses an adverse effect under Section 106. As such, discussion within this document is limited to the considerations for the district as a historic site. For additional information on Section 4(f) see https://www.environment.fhwa.dot.gov/4f/4fpolicy.asp#hbho.

1. "The property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination and prior to listing."

2. "Additional information shows that the property does not meet the National Register criteria for evaluation."

3. "Error in professional judgment as to whether the property meets the criteria for evaluation."

4. "Prejudicial procedural error in the nomination or listing process."[32]

Due to the technicalities of the above provisions for removing a property from the National Register, of the four options presented by the NPS, only the third option, "Error in professional judgment as to whether the property meets the criteria for evaluation," may be applied to the CM&StP Historic District. Since the majority of the changes within the corridor occurred prior to its listing, there is no basis to remove the district from the National Register under the grounds of option 1, which states "The property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination and prior to listing." [33] Other reasons for delisting, such as additional information coming to light (option 2) or prejudicial procedural error (option 4), are not applicable to the CM&StP Historic District.

A case may be made for consideration of de-listing the CM&StP Historic District under option 3 because changes to the corridor between 2000 and 2004 were not well documented in the Nomination and may not have been fully known to the State Review Board. Based on a review of available resources that document the process for nominating the district, the drafting of the CM&StP Nomination narrative text occurred in 2002, with revisions undertaken and submitted to the SHPO for review in 2004, prior to completion of Hennepin County's second phase of trail development, which extended from 5th Avenue to the east (continuing beyond the district's eastern boundary). As such, three of seven concrete access ramps and both pedestrian bridges were not yet erected at the time of the SHPO's review of the Nomination. The 2004 draft resubmittal letter and SHPO review comments do not discuss alterations to the draft or the changes that occurred within the district between 2002 and 2004, including construction of the additional access ramps and pedestrian bridges. In addition, comments received in 2002 on the draft Nomination do not address resource counts or the large-scale features (access ramps and the elevated trail) within or planned within the district. Therefore, it is uncertain how much knowledge the National Register coordinator had of the additional features within the trench.

Additionally, the Nomination's photographic record of resources found in the district boundary is limited and does not accurately reflect the size and scale of certain resources. Photographs of the district were taken in 2002, during the period when only half of the Hennepin County improvements were made. The

[32] National Park Service, "National Register of Historic Places Program: National Register Federal Program Regulations," Section 60.15, *National Park Service,* https://www.nps.gov/nr/regulations.htm#6015.

[33] National Park Service, "National Register of Historic Places Program: National Register Federal Program Regulations," Section 60.15, *National Park Service,* https://www.nps.gov/nr/regulations.htm#6015.

final draft of the Nomination was submitted in December 2004 and the presentation to the State Review Board occurred in March 2005. As presented to the State Review Board, the Nomination included only one photograph of an access ramp (of seven ramps that were present). The photograph of the one ramp does not accurately reflect its scale as it was taken against the direction of the ramp and straight down the corridor. As a result, the ramp simply looks like a retaining wall within the trench, rather than a new, large access point into the corridor. Likewise, photographs do not adequately convey the elevation of the trail in the western half of the district. Photographs of the trail are straight down the corridor and therefore one does not sufficiently see the difference between the original trench grade and the constructed trail.

It is uncertain if the State Review Board was fully aware of the district's integrity at the time of nomination, based on photographs and Nomination text that do not fully address the changes made to the district prior to its listing in 2005.

In order to de-list a property, one must petition the Keeper of the National Register with grounds for removal. Any individual or organization can petition for removal. While federal regulations do not require the petition to be taken to the State Review Board, it is recommended. De-listing a property is an unusual occurrence nationally and is typically reserved for demolished properties.[34] In Minnesota, 117 resources of 1,670 total listed resources (seven percent) have been removed from the National Register since 1970. According to the Minnesota SHPO, "properties are removed from the National Register only if they lose the qualities they had at the time of listing. Properties have been removed if they have been destroyed by fire or storms, or have been substantially altered. Properties are automatically removed from the Register if they have been moved."[35] Based on a review of the SHPO's website most properties were de-listed because of demolition or removal of a property.[36]

The historic integrity of the CM&StP Historic District is diminished but sufficient to express significance under National Register C*riterion A*. Loss of integrity is evident where cumulative impacts are exhibited; the trench walls and bridges are removed, replaced, or added; where a retaining wall elevates the trail through half of the corridor; and where intrusions into the district boundary occur, including the presence of access ramps, terraces and buildings. However, enough of the district's essential physical features, as expressed through the grade separation and repetition of separation structures, are maintained. For the

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[34] A few instances were identified where a property was removed from the National Register due to loss of historic integrity, such as the Brooks Arcade (de-listed 2014) or Soldier Field (2006). Joe Bauman, "Should Brooks Arcade Lose Historic Listing," *Deseret News,* June 24, 2001, available at http://www.deseretnews.com/article/849810/Should-Brooks-Arcade-lose-historic-listing.html?pg=all; National Park Service, "National Register of Historic Places Program: Weekly List" available at http://www.nps.gov/nr/listings/20140711.htm and http://www.nps.gov/nr/listings/20060428.HTM.

[35] Minnesota Historic Preservation Office, "National Register General Program Questions," 2011, available at http://www.mnhs.org/shpo/nrhp/docs_pdfs/faqnr.pdf

[36] As of 2013, approximately two percent of listed properties have been removed from the National Register nationally, largely due to demolition. Adrienne La France, "1,750 Sites Removed from National Register of Historic Places Since 1970 (with searchable database), *News-Herald,* February 3, 2013, http://www.news-herald.com/article/HR/20130203/NEWS/302039919; "Results of Minnesota State Historic Preservation Office, "National Register Property Search," http://www.mnhs.org/preserve/nrhp/.

reasons expressed above, a compelling case for de-listing because an "error in professional judgment" was not identified through the present analysis.

If the district remains listed on the National Register, as recommended, projects undertaken within the district boundary will continue to be reviewed under applicable state and federal laws including Minnesota Historic Sites Act, the Minnesota Environmental Policy Act (MEPA), Section 106, and Section 4(f).

B. Proposed management approach for the CM&StP Historic District

Historians also investigated ways MnDOT CRU and district owners could manage projects within the district in light of the diminished integrity and potential for further changes. Options explored included the consideration of a discontiguous district, revision of the district's boundary, and treatment of certain blocks as non-contributing. Both consideration of a discontiguous district and revision of the district's boundary were found to be inapplicable to the circumstances present within the CM&StP Historic District and were not studied further; reasons for their dismissal are documented in Appendix E. Based on the guidelines presented in the National Register Bulletins *How to Apply the National Register Criteria for Evaluation* and *Defining Boundaries for National Register Properties,* consideration of a management approach that treats selected blocks as noncontributing, on the other hand, may be beneficial.

NPS guidelines allow for calling out contributing and noncontributing resources (buildings, structures, sites, and objects) within a district but are mute on defining contributing or noncontributing segments, blocks, or areas. District boundaries cannot be drawn to exclude noncontributing segments, blocks, or areas unless those areas meet the circumstances described under a discontiguous district. However, in Minnesota there is precedent between SHPO and MnDOT CRU to consider linear resources with contributing and noncontributing segments within the larger whole of the proposed district. For example, under a Section 106 compliance review the agencies have contemplated defining a portion of the CM&StP Historic District from Stevens Avenue to 5th Avenue that lacks historic integrity as a noncontributing segment to the larger district. Additionally, the *Railroads in Minnesota 1862-1956* Multiple Property Documentation Form (listed in 2013), allows for contributing and noncontributing segments within a recommended eligible railroad corridor historic district.

Currently, proposed projects within, or adjacent to, the boundaries of the historic district are reviewed under applicable state and federal regulations. Project sponsors, including MnDOT CRU and local governments, plan and prepare projects that avoid, minimize, and/or mitigate effects to the historic district as required. To better focus the future efforts on proposed projects that may affect the district's historic qualities, agencies and bridge owners could adopt an approach that designates certain segments of the district as contributing or noncontributing. This approach could be implemented through adoption of a Programmatic Agreement.

The Programmatic Agreement between the SHPO, FHWA, MnDOT CRU and any other consulting parties, would streamline the Section 106 review process and help address and minimize potential changes within and adjacent to the district. Stipulations of the agreement could provide for continued review of projects within or adjacent to those segments defined as contributing. Projects within noncontributing segments could be exempted from such reviews. With respect to Section 4(f) regulatory

requirements, projects should be reviewed individually with appropriate agencies for applicability under Section 4(f).

The Programmatic Agreement would specify contributing and noncontributing segments. Following this approach historians recommend that the 19 blocks retaining historic integrity, as outlined in Table 3, would be considered contributing; the 23 blocks with poor integrity would be considered noncontributing. The 19 contributing blocks listed below were found to retain essential physical characteristics needed to convey significance. These characteristics included retention of at least 50 percent of the block's grade separation structures and trench walls (where historically). The SHPO agreed with the contributing finding for these blocks:

- Blocks 1-2
- Blocks 13-15
- Blocks 18-19
- Blocks 25-26
- Blocks 28-29
- Block 34
- Blocks 36-39
- Blocks 41-43

Conversely, the project team recommends that 23 blocks be considered noncontributing because they have significant alterations. This recommendation takes into consideration all changes outside of the district's period of significance and were not limited to those changes that occurred after listing in 2005.[37] The following explains why blocks were considered noncontributing:

- Blocks 3-12. Integrity of design is impacted through the replacement of the Hennepin, Emerson, Dupont, Lyndale, and Garfield Avenue bridges; elevated trail; access ramps at Girard, Colfax, and Bryant Avenues; two new terraces at Dupont and Garfield Avenues; addition of a new retaining wall between Hennepin and Freemont Avenues; addition of a new pedestrian bridge at Girard Avenue; and loss of original buildings that served as the trench walls at Dupont and Lyndale Avenues.

- Blocks 16-17. Significant alterations include presence of an elevated trail with retaining wall, replacement of the Blaisdell Avenue Bridge, and construction of an access ramp between Blaisdell and Nicollet Avenues (Block 17).

- Blocks 20-24. Substantial alterations are I-35W bisecting the district, addition of two bridges, removal of historic bridges at 3rd and Clinton Avenues, and replacement of the 4th Avenue Bridge.

[37] This approach differs from the SHPO's recommendation. In their review of contributing and noncontributing segments the SHPO applied the standard for delisting a district to alterations resulting in a noncontributing finding. Therefore, they considered only changes after the district's listing in 2005. The letter with SHPO's recommended contributing and noncontributing blocks can be found in Appendix D.

- Block 27. Erection of a new access ramp and replacement of the Park Avenue Bridge alters this block.

- Blocks 30-34. Integrity of design is impact through the replacement of the Chicago Avenue Bridge; addition of a pedestrian bridge at Elliot Avenue; substantial alteration of the 10th and 11th Avenue Bridges; erection of a new terrace at Chicago Avenue; and removal of a historic retaining wall between 11th and 12th Avenues.

- Block 35. A new access ramp impacts integrity of design within this block.

- Block 40. A new access ramp impacts integrity of design within this block.

It is important to note that SHPO disagrees with the recommendation that Blocks 5, 8-10, 16-17, 27, 30, 33 and 40 are noncontributing to the district, because the changes to these blocks occurred prior to the district's Nomination and replacement bridges conformed with the SOIS for Rehabilitation and were therefore compatible with the district and did not impact the district's integrity. See Appendix D for a copy of SHPO's letter. MnDOT CRU's position is that the removal of a historic bridge diminishes the district's integrity of design, materials, workmanship, feeling, and association. Replacement bridges designed with the SOIS help minimize integrity issues, resulting in a more compatible structure within the district. However, the use of the SOIS does not avoid the negative impact to the district. This philosophy is shared by the project team and reflected in the above block recommendations. It is recommended that MnDOT CRU and SHPO come to an agreement regarding these blocks prior to negotiation and execution of a Programmatic Agreement.

C. Considerations for future study

While the CM&StP Historic District currently retains sufficient integrity, it is likely that additional alterations within and adjacent to the district will occur. Changes that impact historic integrity may transpire with or without MnDOT CRU or SHPO knowledge as undertakings by private developers are not reviewed by state agencies. As such, it is recommended that MnDOT CRU and/or Hennepin County could consider reevaluation of the district at scheduled intervals, such as every five years. Other actions that might spur reevaluation of the district outside of a scheduled interval include replacement or modification of original bridges, continued private development within the district boundary (including construction of terraces, access ramps, and/or staircases), removal or modification of trench walls or buildings, construction of new pedestrian bridges over the trench, additional residential development directly adjacent to the district (especially in the eastern end of the district), or the construction of a light rail or trolley within the trench.[38]

[38] Hennepin County plans for the replacement of three bridges in the coming two years. The Cedar and Portland Avenue Bridges are scheduled for removal in 2017 and the Freemont Avenue Bridge is likely to be replaced in 2018. The removal of these bridges was not considered within the integrity review and assessment since they were extant at the time of this report.

The reevaluation of the district can build upon the findings presented in this report and would include a reassessment of the number of contributing and noncontributing resources within the district and reevaluation of the district's overall integrity. Upon loss of a majority of the district's integrity, especially if further changes occur within the eastern half of the district, MnDOT CRU and/or Hennepin County could consider taking the option of de-listing the district to the State Review Board or the Keeper of the National Register.

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Appendix A. Previous Studies

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Appendix A. Previous studies

The following list summarizes past studies undertaken within the CM&StP Historic District.

- Design Workshop – 2001
  In 2001 the University of Minnesota Design Institute, the Midtown Community Works Partnership, the Midtown Greenway Coalition, Forecast Public Artworks, City of Minneapolis Office of Cultural Affairs, City of Minneapolis Public Works and Hennepin Community Works hosted a workshop to design new and innovative crossings over the Midtown Corridor. Design teams were comprised of artists, architects, and engineers. The public and neighborhoods adjacent to the corridor provided input and feedback to the design process. Ultimately, the City of Minneapolis utilized the design concepts developed from the workshop as guidelines for subsequent bridge replacement projects by employing the designs as an educational tool and to integrate art into the urban design. According to Hennepin County, the workshop directly influenced the design for the Chicago Avenue Bridge.

- **Midtown Corridor Historic Bridge Study – 2007**
  In 2007 TKDA and Hess Roise and Company prepared a study of the bridges within the CM&StP Historic District for the City of Minneapolis to address a Memorandum of Agreement (MOA) stipulation as decided between the Minnesota Historic Preservation Office (SHPO) and the Federal Highway Administration (FHWA). The project grew out of the replacement of the Chicago and Park Avenue Bridges in 2005 and 2006. The study has in-depth analysis of five bridges within the district: the Fremont, Pleasant, Columbus, 10th, and 19th Avenue Bridges. Findings were then extrapolated to the other bridges within the district. The study also addressed changes to the district since the time of the Nomination and included discussion of the district's historic integrity.

- **Cultural Landscape Management and Treatment Guidelines – 2008**
  In 2008 the Hennepin County Regional Railroad Authority (HCRRA) prepared a management plan for the CM&StP Historic District to meet an MOA stipulation prepared between SHPO and the FHWA for the continued development of the trail in 2002. The management plan provides a brief overview and features of the district. Guidelines on the appropriate treatment of features within the district make up the bulk of the management items and include recommendations for maintaining the spatial organization of the district, topography, vegetation, circulation, access, buildings, structures and objects, and water features. In addition, the management plan provides guidance on accessibility, health and safety, and environmental considerations for future projects within the district.

- **Midtown Corridor General Bridge Management Plan – 2015**
  Prepared in 2015 for Hennepin County in partnership with MnDOT CRU by ONE and Gemini Research, this management plan provides general guidance on the repair and rehabilitation of bridges within the historic district. Also included within the plan are individual reports discussing engineering concerns for 37 bridges. The report contains a general historic overview of the district, including character-defining features and a list of contributing and noncontributing bridges.

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Appendix B. 2005 CM&StP Historic District National Register Nomination

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NPS Form 10-900
(Oct. 1990)

OMB No. 1024-0018

United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Chicago Milwaukee and St. Paul Railroad Grade Separation

other names/site number Midtown Greenway

2. Location

street & number Corridor parallel to 29th St. between Humboldt Ave. S. and 20th Ave. S. ☐ not for publication N/A

city or town Minneapolis ☐ vicinity

state Minnesota code MN county Hennepin code 053 zip code 55408, 55407

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act of 1986, as amended, I hereby certify that this ☒ nomination ☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property ☒ meets ☐ does not meet the National Register Criteria. I recommend that this property be considered significant ☐ nationally ☐ statewide ☒ locally. (☐ See continuation sheet for additional comments.)

Patrick J. McCormack 4/5/05

Signature of certifying official Date

Patrick McCormack, Deputy State Historic Preservation Officer, Minnesota Historical Society

State or Federal agency and bureau

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. (☐ See continuation sheet for additional comments.)

Signature of commenting or other official Date

State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that this property is: Signature of the Keeper Date of Action

☐ entered in the National Register
☐ See continuation sheet.
☐ determined eligible for the National Register
☐ See continuation sheet.
☐ determined not eligible for the National Register
☐ removed from the National Register
☐ other (explain):

5. Classification

Ownership of Property
(Check as many boxes as apply)

- ☒ private
- ☒ public-local
- ☒ public-State
- ☐ public-Federal

Category of Property
(Check only one box)

- ☐ buildings(s)
- ☒ district
- ☐ site
- ☐ structure
- ☐ object

Number of Resources within Property
(Do not include previously listed resources in the count)

Contributing	Noncontributing	
1	7	buildings
0	0	sites
30	10	structures
0	0	objects
31	17	Total

Name of related multiple property listing
(Enter "N/A" if property is not part of a multiple property listing.)

Reinforced-Concrete Highway Bridges in Minnesota

Number of contributing resources previously listed in the National Register

N/A

6. Function or Use

Historic Functions
(Enter categories from instructions)

TRANSPORTATION/rail-related

Current Functions
(Enter categories from instructions)

TRANSPORTATION/pedestrian-related

7. Description

Architectural Classification
(Enter categories from instructions)

No Style

Materials
(Enter categories from instructions)

foundation CONCRETE (bridges)
walls EARTH
CONCRETE
roof N/A
other CONCRETE (bridges)

Narrative Description
(Describe the historic and current condition of the property on one or more continuation sheets.)

8. Statement of Significance

Applicable National Register Criteria
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing)

- ☒ A Property is associated with events that have made a significant contribution to the broad patterns of our history.
- ☐ B Property is associated with the lives of persons significant in our past.
- ☐ C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- ☐ D Property has yielded, or is likely to yield information important in prehistory or history.

Criteria Considerations
(Mark "X" in all the boxes that apply.)

Property is:

- ☐ A owned by a religious institution or used for religious purposes.
- ☐ B removed from its original location.
- ☐ C a birthplace or a grave.
- ☐ D a cemetery.
- ☐ E a reconstructed building, object, or structure.
- ☐ F a commemorative property.
- ☐ G less than 50 years of age or achieved significance within the past 50 years.

Areas of Significance
(Enter categories from instructions)

COMMUNITY PLANNING AND DEVELOPMENT

Period of Significance

1912-1916

Significant Dates

1912
1916

Significant Person
(Complete if Criterion B is marked above)

N/A

Cultural Affiliation

Architect/Builder
Loweth, Charles Fredrick
Lothholz, H. C.

Narrative Statement of Significance
(Explain the significance of the property on one or more continuation sheets.)

9. Major Bibliographical References

Bibliography
(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)

Previous documentation on file (NPS)

- ☐ preliminary determination of individual listing (36 CFR 67) has been requested.
- ☐ previously listed in the National Register
- ☐ previously determined eligible by the National Register
- ☐ designated a National Historic Landmark
- ☐ recorded by Historic American Buildings Survey # _____
- ☐ recorded by Historic American Engineering Record # _____

Primary Location of Additional Data

- ☒ State Historic Preservation Office
- ☐ Other State agency
- ☐ Federal agency
- ☐ Local government
- ☐ University
- ☐ Other

Name of repository:

10. Geographical Data

Acreage of Property 59 acres

Minneapolis South, Minn. 1967, Revised 1993
St. Paul West, Minn. 1967, Revised 1993

UTM References
(Place additional UTM references on a continuation sheet)

	Zone	Easting	Northing		Zone	Easting	Northing
1	15	476320	4977450	3	15	480805	4977140
2	15	480805	4977450	4	15	476320	4977140

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet.)

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title Andrea C. Vermeer, M.A. and William E. Stark, M.A

organization The 106 Group Ltd. date December 23, 2004

street & number 370 Selby Avenue Suite 206 telephone 651-290-0977

city or town St. Paul state Minnesota zip code 55102

Additional Documentation

Submit the following items with the completed form:

Continuation Sheets

Maps

A USGS map (7.5 or 15 minute series) indicating the property's location.
A Sketch map for historic districts and properties having large acreage or numerous resources.

Photographs

Representative black and white photographs of the property.

Additional items
(Check with the SHPO or FPO for any additional items)

Property Owner

(Complete this item at the request of the SHPO or FPO.)

name _____

street & number _____ telephone _____

city or town _____ state _____ zip code _____

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reductions Project (1024-0018), Washington, DC 20503.

Narrative Description

Introduction

The Chicago Milwaukee and St. Paul (CM and StP) Grade Separation is a 2.8-mile-long transportation district formed by a depressed railroad trench located in southeast Minneapolis, Minnesota. While the trench has only been present since 1912, the CM and StP rail line began running through this location in 1879, resulting in the area's mixed residential and industrial character. In 1912, the year that construction on the trench began, the neighborhoods surrounding the corridor were primarily residential and comprised mostly of modest middle- or working-class houses, but included the wealthy Park Avenue residences as well; however, over half of the properties directly alongside the rail line were industrial, and Lake Street, one block south of the rail corridor, was rapidly developing as one of the city's major commercial corridors. The rail corridor follows a straight, linear path from Humboldt Avenue South (on the west end) to Cedar Avenue South, where it then arches northward to meet East Twenty-Eighth Street (at its eastern terminus). The character-defining features of the linear historic district include a 22-foot- (6.7-meter-) deep trench through which the railroad passed, street bridges that span the trench, and adjacent buildings that form the walls of the trench. The railroad tracks that once ran the course of the district have been replaced by a bituminous bicycle and pedestrian trail.

Historical Character of the District

The original CM and StP railroad corridor was constructed between 1879 and 1881 as part of the Benton Cutoff, connecting Minneapolis flour mills with the wheat producing regions of western Minnesota and southern Dakota Territory. Following a 1910 ordinance by the Minneapolis City Council, ordering the CM and StP to depress the railroad line between Irving and Hiawatha Avenues South, and the subsequent Minnesota Supreme Court decision upholding the city's right to enforce such an action, work on the track depression began in 1912 and was completed in 1916. H. C. Lothholz of the CM and StP was the acting engineer of design, and C. F. Loweth, chief engineer of the CM and StP, supervised the project.

Railroads entered the trench between Humboldt and Hennepin Avenues South on the west end, or between East Twenty-Eighth Street and Cedar Avenue South on the east end. The Hennepin and Cedar Avenue bridges mark the first street-crossing bridges on either end of the corridor. The majority of the sidewalls of the trench are formed by a sloped earthen embankment with a ratio of one-and-a-half horizontal to one vertical. The approximate width of the trench at the track grade ranges from 60 feet (18.3 meters) to 35 feet (10.7 meters). The approximate width of the trench at the top of the slope (street grade) ranges from 135 feet (41.1 meters) to 110 feet (33.5 meters).

The area surrounding the corridor is comprised of both industrial and residential properties. Residential buildings, primarily on the south side of the corridor between the railroad and Lake Street, are generally comprised of two-story single-family houses or duplexes constructed between 1880 and 1930. Many of the houses are slightly buffered from the railroad by being situated south of Twenty-Ninth Street, which for much of the route is immediately adjacent to the rail corridor. Lake Street runs parallel to the railroad one block to the south and is mostly commercial in nature, historically offering a wide range of shopping opportunities. Most of the industrial properties are located on the north side of the railroad and either serviced the railroad (such as coal yards) or were manufacturing plants that took advantage of the rail transportation (such as sash and blind manufacturers). In spite of the surrounding residential community, the presence of these industries along the corridor gave a distinctly industrial feel to the CM and StP corridor. While many of the larger industries once situated along side the railroad are no longer extant, and others have been erected that post-date the period of significance, the form and shape of the grade separation project and its significant contributing features remain intact.

Features of the District

Buildings

Eight buildings that are adjacent to the corridor and situated within the slope of the trench contribute to the formation of its edge (Table 1). On each of these buildings, the walls facing onto the railroad corridor define the vertical plane of the trench, thus the buildings, in their entirety, are within the boundaries of the historic district. With the exception of the Sears building, which is taller, these properties are one- or two-story buildings, generally rectangular in plan, with the long side oriented parallel to the railroad tracks. Their uses (creamery, separator company, lumber company, steel works, warehouse, manufacturer, and retail distributor) typically took advantage of their proximity to the railroad, creating portals that allowed access to railroad spurs. In the case of the Sears building, a 1964 addition was constructed to bridge the railroad trench, enclosing the section between Elliot and Tenth Avenues South. This bridging addition was demolished in December 2004.

Since only one of the eight properties that form a vertical plane of the trench, the Twin City Separator Company building, was extant during the period of significance (1912-1916) and retains historical integrity, it is the only property among the eight that is contributing to the district. The remaining seven properties are non-contributing but included within the historic district boundaries because they help to define the edge of the trench (see accompanying map "District Boundary, Photo Key and Sketch Map, 2004").

Table 1. Buildings

Name	Address	Date of Construction	Contributing/ Non-Contributing	Reason for Non-Contributing
Norris Creameries building	2828 Emerson Avenue South	1946	Non-Contributing	Not within period of significance
Twin City Separator Company building	2841 Dupont Avenue South	c. 1890; 1909	Contributing	--
Bruer Bros. Lumber Company building	2836 Lyndale Avenue South	1921	Non-Contributing	Not within period of significance
Western Alloyed Steel Casting Company building	2848 Pleasant Avenue South	1916	Non-Contributing	Lack of integrity
Eighth Ward Warehouse building	2900 Pleasant Avenue South	1919; 1927	Non-Contributing	Not within period of significance
Sears, Roebuck and Company building	2929 Chicago Avenue South	1928;1929	Non-Contributing	Not within period of significance
Sears Addition	2800 Tenth Avenue South	1978	Non-Contributing	Not within period of significance
Dayton Rogers Manufacturing Company building	2824 Thirteenth Avenue South	1937; 1940-1947	Non-Contributing	Not within period of significance

The Norris Creameries building is a one-story commercial building, built for Norris Creameries, Inc., in 1946. The foundation is poured concrete, and the walls are constructed of concrete block. Brick facing is located on the front (east) façade. The wall is flat with a parapet wall capped with cast stone and terra cotta coping. The windows are filled with glass block covered by metal screens. A large garage bay has been inserted into the east wall. Loading bays on the lower level adjacent to the railroad have been closed. A modern addition has been added to the north end. Because the building was not constructed within the period of significance for the district, it is non-contributing.

The Twin City Separator Company building is a brick manufacturing facility, once comprised of several units stretching between Dupont and Colfax Avenues South on the north edge of the railroad corridor. The site has been used for manufacturing since the 1890s. The various sections that now make up this building are believed to have been constructed between 1898 and 1954 for use as a fence factory, separator company, and window and sash manufacturer. Several modifications to the building were necessary when the trench was dug for the CM and StP track depression, including underpinnings to support the building at the railroad grade level. The Twin City Separator is a contributing building.

The Bruer Bros. Lumber Company building extends from Lyndale Avenue westward along the north wall of the depressed railroad corridor. The concrete block foundation supports a concrete block and balloon frame building. Much of the siding has been replaced during a renovation with a stucco façade on Lyndale Avenue and corrugated metal on the rear portion facing the railroad corridor. The low-pitched gabled roof is covered with corrugated sheets. Replacement windows are 6/6 double-hung sash (with false muntins) and transoms in a regular pattern. Storefront windows are located on Lyndale Avenue. Large windows and glass overhead doors on the basement level provide access to the greenway corridor. Because the Bruer Bros. Lumber Company building was constructed outside the period of significance of the district, it is non-contributing.

The Western Alloyed Steel Casting Company building was reconstructed in 1916 when the railroad grade separation was formed. It spans the width of the block between Pleasant and Grand Avenues. The foundation is concrete, and the walls are made of concrete blocks. The east façade is comprised of seven bays. The inner three bays are two stories tall and are flanked on each side by two one-story bays. The façade is covered with textured brick and is capped with a parapet wall. Large glass-block windows are located on the east façade, with regular glass-block fenestration along the south façade. The central bays form a clerestory level. On the north side, a wall constructed of matching brick encloses the compound. Openings on the lower level to the railroad on the north side have been enclosed with concrete block. Because of the significant alterations to the building, particularly the enclosure of the access to the railroad, the building does not contribute to the district due to a lack of integrity.

The Eighth Ward Warehouse building is a complex of two similar buildings, constructed in 1919 and 1927, set parallel to the railroad bed, one facing Pleasant Avenue and one facing Grand Avenue. The long, one-story buildings have poured concrete foundations, with masonry walls of multi-colored brick. Modern wood shingles have been placed in the front gable ends. The gable roofs are covered with asphalt shingles. Modern plate-glass windows have been inserted into the segmental arch openings on the street-front facades. Brick piers form the bays on the north side, where access to the railroad has been closed. A large garage addition has been added to the south side of the west building. These buildings do not contribute to the district because they were not constructed within the period of significance.

The Sears, Roebuck and Company building was constructed in 1928 at 2929 Chicago Avenue South, adjacent to the CM and StP railroad line. The large building, covering approximately three acres, was built to house a warehouse for the mail order business as well as a retail store. The building's defining element is the central square tower, centered on its west façade. The warehouse rises twelve stories. It is set back from the tower and the two three-story wings that extend north and south from the tower and housed the retail store. The warehouse and retail

building is made of reinforced concrete with a slab foundation and floors. The walls are faced in cream and tan brick laid in running bond with light mortar and trimmed with Bedford limestone. The front (west) façade is treated with a series of recessed wall surfaces organized around the tower and terminated in a parapet. The fenestration is comprised of single, double, and triple windows in a generally uniform pattern. Primary entrances to the retail store are located on the vacated Elliot Avenue South, Tenth Avenue South, and East Lake Street. A train shed was constructed within the rail trench in 1928, incorporating the 10th Avenue bridge; in 1929 the shed was extended to include the Elliot Avenue bridge. Also in 1929, a six-story addition was completed on top of the three-story wing north of the tower. Its materials make it blend seamlessly with the original building. Another addition was constructed in 1964 on the north side over the CM and StP trackage. The air rights were purchased from the railroad to construct a 214,050 square-foot, windowless warehouse sheathed in cream brick. In 1966, a pre-cast concrete roof was raised to add a fourth floor over the south wing retail store facing Lake Street. It is faced with cream brick and set back from the original three-story wing. The last major expansion of the building was in 1978, when a storage facility was connected to the 1964 addition on the north end of the complex. It is faced with aggregate panels with brick piers at the corners and matches the general cream color scheme of the original buildings[1]. In December 2004, the 1964 addition that spanned the railroad corridor was demolished, severing the tie between the 1920s and 1978 sections. The 1978 Sears Addition now stands as a separate building. Although the Sears, Roebuck and Company building is not contributing to the district because it was not constructed within the district's period of significance, it has been determined individually eligible for listing on the National Register of Historic Places under Criterion A in the area of commerce. A passage connects the 1978 Sears Addition building with the rail corridor and is considered to contribute to the formation of the trench's vertical plane. The Sears Addition, therefore, is considered to be a non-contributing property within the district boundaries.

The Dayton Rogers Manufacturing Company building is a one-story manufacturing building with a broad rectangular plan. It was probably constructed as an addition to the adjacent north building in several phases between 1940 and 1947. The foundation is poured concrete, and the metal frame structure has a veneer of red and variegated smooth bricks. The roof is flat with a parapet. The long stretch of evenly spaced fenestration (14 bays) on the west façade is made up of metal casement windows with hoppers. Decorative details include soldier course brick patterns and limestone headers. This building is connected with the Dayton Rogers building on the north, constructed in 1937. This is a two-story brick building that has a cut limestone entrance with a marble surround. Window openings on this building have been replaced and resized with smaller windows and panels. Because the building was not constructed within the period of significance for the district, it is non-contributing.

Structures

The primary structure in the CM and StP Grade Separation is the earthen trench, which extends from Humboldt Avenue on the west to Twentieth Avenue South on the east (Table 2). The trench is approximately 22 feet (6.7 meters) deep and has a steeply sloped earthen wall on the north and south. In several locations along the depressed rail corridor, the vertical plane of the

Table 2. Structures

Name	Year of Construction	Mn/DOT Bridge No.	Minneapolis Bridge No.	Contributing/ Non-Contributing
Trench	1912-1916	n/a	n/a	Contributing
Retaining Wall	1912-1916	n/a	n/a	Contributing
Bicycle/Pedestrian Trail	2000; 2004	n/a	n/a	Non-Contributing
Cedar Avenue Bridge	1916/1915	90437	4750	Contributing
Eighteenth Avenue Bridge	1916	L8923	7751	Contributing
Seventeenth Avenue Bridge	1916	L8922	7752	Contributing
Sixteenth Avenue Bridge	1916	L8921	7753	Contributing
Bloomington Avenue Bridge	1916	92350	4754	Contributing
Fifteenth Avenue Bridge	1916	L8920	7755	Contributing
Fourteenth Avenue Bridge	1916	L8919	7756	Contributing
Thirteenth Avenue Bridge	1915	L8918	7757	Contributing
Twelfth Avenue Bridge	1915	L8917	7758	Contributing
Eleventh Avenue Bridge	1915	L8916	7759	Contributing
Tenth Avenue Bridge	1915	L8915	7760	Contributing
Elliot Avenue Bridge	1915	L8914	7761	Contributing
Chicago Avenue Bridge	1915	92349	4762	Contributing
Columbus Avenue Bridge	1915	L8913	7763	Contributing
Park Avenue Bridge	1915	90491	5764	Contributing
Oakland Avenue Bridge	1915	L8911	7765	Contributing
Portland Avenue Bridge	1914	90494	5766	Contributing
Fourth Avenue Bridge	1997	92348	4767	Non-Contributing
Second Avenue Bridge	1982	27648	4741	Non-Contributing
I-35W Bridge	1967	27867	1137	Non-Contributing
Stevens Avenue Bridge	1914	L8910	7771	Contributing
First Avenue Bridge	1914	92347	4772	Contributing
Nicollet Avenue Bridge	1914	90590	7773	Contributing
Blaisdell Avenue Bridge	1982	27610	4774	Non-Contributing
Pillsbury Avenue Bridge	1914	L8909	7775	Contributing
Pleasant Avenue Bridge	1913	L8908	7776	Contributing
Grand Avenue Bridge	1914	L8907	7777	Contributing
Harriet Avenue Bridge	1914	L8906	7778	Contributing
Garfield Avenue Bridge	1992	27675	7779	Non-Contributing
Lyndale Avenue Bridge	1987	27243	5780	Non-Contributing
Aldrich Avenue Bridge	1913	L8904	7781	Contributing

Name	Year of Construction	Mn/DOT Bridge No.	Minneapolis Bridge No.	Contributing/ Non-Contributing
Bryant Avenue Bridge	1913	L8903	7782	Contributing
Colfax Avenue Bridge	1913	L8902	7783	Contributing
Dupont Avenue Bridge	1987	27666	4785	Non-Contributing
Emerson Avenue Bridge	1986	27665	4786	Non-Contributing
Fremont Avenue Bridge	1913	L8901	7787	Contributing
Hennepin Avenue Bridge	1980; 2000	27599	5788	Non-Contributing

trench is defined not by the earthen slope, but by reinforced-concrete retaining walls. These walls were usually installed where the trackage was expanded to accommodate additional spurs to provide a wider rail bed. These walls are unadorned and utilitarian in nature, but they contribute to the character of the depressed corridor. Several segments have a parapet wall with a recessed panel (much like the associated bridges) located at street grade. One wall segment on the south side, between Dupont and Colfax Avenues South, is supported by buttresses and features a tunnel under Twenty-Ninth Street, providing access to the adjoining property. The various segments of this wall comprise one contributing structure.

In three locations, a vertical plane does not define the edge of the trench. On the north side of the corridor, between Emerson and Dupont Avenues South, the adjacent lot is at the grade of the railroad bed. This property was historically used as a coal yard, and it is now used as a lumber storage yard. The second area is on the north side of the tracks between Garfield and Harriet Avenues South. This parcel is not divided from the tracks by a wall or by a steep slope, but is instead terraced and currently used as public garden. It was formerly the location of a grain elevator. The third area is between Fourth and Portland Avenues South, including Fifth Avenue South. This was the only at-grade street crossing permitted in the original plan and continues to be the only at-grade crossing in the district. Because the street meets the railroad grade via a gentle slope, the edges of the track depression are not present within this area. Portions of this segment also include what was formerly the railroad switching yard. Although the railroad tracks are no longer present, the open areas are maintained and have been converted into sports fields.

Twenty-eight of the original 37 reinforced-concrete street bridges still span the depressed railroad corridor and are contributing structures to the district. After the trench itself, the bridges are the most prominent structural features of the district. The bridges are concrete, continuous-girder design and feature modest Classical Revival-style detailing. The city ordinance was particular is specifying not only the bridge width, but also in requesting that the roadway of each bridge be paved and outfitted with an eight-foot sidewalk on either side.

Although each bridge was specifically engineered for its location, their overall designs were nearly identical, with only minor variations. The width of the bridge deck (from outer edge to outer edge) for most of the bridges is 49 or 51 feet. Wider bridges include Cedar Avenue (60 feet), Bloomington Avenue (63 feet), Chicago Avenue (71 feet), Park Avenue (70.4 feet), and Nicollet Avenue (83 feet). Except in the case of Park Avenue, these wider bridges correspond with the north-south streetcar lines that once used the bridges. With two exceptions (at Fourth Avenue and Clinton Avenue where a sidings yard required ten and six spans, respectively; both historical bridges are no longer extant), the reinforced-concrete bridges were comprised of three spans, with the bed supported by three square, concrete, double-arched, vaulted piers (six piers were used on the wider Chicago Avenue and Park Avenue bridges; the Nicollet Avenue bridge employed wider piers and vaulting).

The two main tracks were laid under the center span, while the side spans accommodated the slope of the depression wall in most instances. In some cases, additional tracks that were necessary for industrial or railroad operations were constructed under these side spans. Where these additional tracks were placed under the side spans, a reinforced-concrete wall would be built integral with the abutments and any adjacent retaining wall. A full-height retaining wall could accommodate two industry tracks, while a lower retaining wall was sufficient for one industry track. The full-height retaining walls are located on north side of the Fourteenth Avenue, Thirteenth Avenue, Eleventh Avenue, Tenth Avenue, Elliot Avenue, Chicago Avenue, Columbus Avenue, Park Avenue, Oakland Avenue, Portland Avenue, Stevens Avenue, Pleasant Avenue, Grand Avenue, Harriet Avenue, Aldrich Avenue, Bryant Avenue, Colfax Avenue, and Fremont Avenue bridges, where most of the industrial facilities are located. Full-height retaining walls are located on the south side of the Tenth Avenue, Elliot Avenue, Nicollet Avenue, Pleasant Avenue, and Colfax Avenue bridges. The lower retaining walls, which could accommodate only one track, were constructed on the north side of the Twelfth Avenue, Nicollet Avenue, and Pillsbury Avenue bridges, and on the south side of the Eleventh Avenue, Pillsbury Avenue, Grand Avenue, and Harriet Avenue bridges.

On all 28 existing original bridges, the superstructure exhibits arched fascia girders decorated with recessed panels at the juncture of the piers. The deck is bound by solid parapet railings with simple recessed panels (the Nicollet Avenue Bridge lacks the parapet panel details on its east side). The specific construction date for each bridge (1912, 1913, 1914, 1915, or 1916) is impressed into the concrete abutment.

Thirty-seven crossings were constructed as part of the grade separation project, 28 of which are extant (contributing). Although the original city ordinance specified that the depressed rail corridor extend from Hiawatha Avenue to Irving Avenue, no bridges were constructed west of Hennepin Avenue or east of Cedar Avenue. The original Hennepin Avenue bridge predated the

project, having been built in 1897, and brought the total number of historical crossings over the trench to 38. Of the 28 remaining bridges associated with the grade separation project, few have had any significant alterations to their character-defining features. A metal pole railing was added to the parapet wall to meet modern pedestrian safety requirements on each of the bridges. Some minor skim-coat repairs have been made to the substructure of the Aldrich Avenue and Bryant Avenue bridges. The parapet wall has been replaced on the Pillsbury Avenue bridge. The Elliot Avenue and Tenth Avenue bridges were modified in the 1920s when Sears constructed a train shed in the south side of the rail bed.

Today, 37 bridges cross the trench, including the 28 bridges constructed as part of the grade separation project; seven replacement bridges (non-contributing) (two of the grade separation bridges were not replaced); the Interstate 35W bridge (non-contributing), created when the interstate was constructed; and the replacement Hennepin Avenue bridge (non-contributing), constructed in 1980 and modified in 2000.

A bituminous bicycle/pedestrian trail roadway was constructed in the bed of the trench from Fifth Avenue South west in 2000, and extended to the entire length of the district in 2004. It includes entry ramps from the street level in several locations.

A total of 40 structures are present in the CM and StP Railroad Grade Separation Historic District, including the trench (contributing), the retaining walls (contributing), the bicycle/pedestrian trail roadway (non-contributing), and 37 bridges (28 contributing and nine non-contributing) (Table 2).

Minor Features

The trackage along the CM and StP Grade Separation has been removed. During the period of significance, the corridor had a minimum of two track systems (one for east bound and one for west bound). Where necessary for the adjacent industries, spur tracks were added to accommodate delivery and distribution. Between Clinton Avenue South and Fifth Avenue South, many more tracks were built on the north side to accommodate a switching yard. Other features associated with the trackage, including switch stands and railroad crossing signals at Fifth Avenue South, have been removed.

An iron picket fence with concrete posts with five discontiguous segments is placed on street grade at the top of the trench from Fremont and Lyndale Avenues South. A system of small patches of granite block, limestone, and concrete retainers with mortar have been placed near the bridge abutments near the upper portion of the slope on the eastern half of the corridor. Although its age could not be conclusively determined, this system visually supports the setting and feeling of the district and is, therefore, recommended as contributing. A series of wooden

utility poles extends along the slope of southern side of the trench and also contributes to the historic district.

Several features are located within the district, but these are minor and not counted among the "Number of Resources within Property" in Section 5. Many of these were added when a bicycle/pedestrian trail was constructed in the corridor in 2000 and 2004. These modern features include a series of modern light standards; several emergency telephone boxes; and bicycle access ramps with associated rock-faced block retaining walls. A modern chain link fence extends the length of the constructed bicycle trail, dividing the trail from the former rail line. Portions of the chain-link fence are placed on top of a rock-faced retaining wall where the bicycle trail is situated at a higher grade than the former rail line.

Other non-contributing features include several types of modern retaining walls made of materials such as rock-faced block, concrete, railroad ties, and concrete slab.

Notes

[1] Garneth O. Peterson, Draft National Register of Historic Places Registration Form for *Sears, Roebuck and Company*. (On file at the Minnesota State Historic Preservation Office, St. Paul, 1998)

Statement of Significance

Introduction

The CM and StP Grade Separation Historic District is significant at the local level in the area of community planning and development under Criterion A because it represents the culmination of efforts by the citizens, city government, and city planners of Minneapolis to direct the future growth and appearance of south Minneapolis while ensuring the safety of its residents and maintaining economically necessary industrial interests. Though the citizens of Minneapolis originally raised the grade separation issue due to safety concerns, the CM and StP grade separation project strongly illustrates the concerns of the Minneapolis citizens and government with city planning and urban aesthetics. This concern is demonstrated by the lengthy battle waged at City Council meetings over the method of grade separation; the creation of a civic commission headed by Edward H. Bennett, a nationally prominent leader of the City Beautiful Movement, to address grade separation in the context of a comprehensive civic plan; and the final outcome in the form of a depressed rail corridor with ornamental bridges. The district is associated with the Minnesota state-level context of *Urban Centers, 1870-1940*, and the local-level context of *South Minneapolis* within the theme of *Urbanization: 1880 to 1920.*

Grade Separation Projects in the U.S.

Railroad grade crossings in high-traffic urban areas have been a concern since the advent of railroads, and the issue of grade separation was commonly addressed in American cities during the late nineteenth and early twentieth centuries. In Buffalo, New York, for example, the first attempt to eliminate grade crossings began in 1856, motivated largely by the regard for public safety and the rise of fatal accidents, while later attempts were also motivated by the general irritation of railroads obstructing street traffic.[1] Between 1856 and 1913, several major cities, including Atlanta, Cincinnati, Cleveland, Columbus, Denver, Kansas City, Minneapolis, Omaha, Philadelphia, Providence, and Scranton, and 27 states, including Arizona, California, Connecticut, Indiana, Iowa, Kansas, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Nevada, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Oregon, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Washington, and Wisconsin, passed ordinances involving the elimination of grade crossings.[2] In a 1915 article entitled "A Study of Grade Crossing Elimination in Cities," the author notes, "The question of the separation of grade crossings in municipalities is vital and its importance cannot be denied. No single question affecting the relations of railroads to cities has received more consideration during the last decade."[3]

The elimination of grade crossings involved either the elevation or depression of tracks and the associated construction of bridges. Plans for grade crossing elimination were typically focused on cost and practical concerns such as soil quality, water level, the right-of-way required, the types of bridges necessary, clearances, retaining walls, and street grade restrictions. Based on the level of interference with street and railroad traffic, the ability to accommodate industrial facilities, and the distribution of noise and smoke, Bainbridge argued that, in general, track elevation was preferable to depression, "with the possible exception of cases where the tracks pass through a high class residence district where the aesthetic is of such importance as to outweigh the other factors."[4] In his 1915 article, he also noted that while much information was available on track elevation, little information on track depression projects had been published, and not many such projects had been completed.

History of the CM and StP Grade Separation Project and Its Relationship to City Planning

When the Hastings and Dakota (H and D) line of the CM and StP was constructed in the mid to late 1800s, it established a route that extended from central and western cities in Minnesota east to Hastings and from this line north to Minneapolis. As the need for a more direct route to Minneapolis became apparent, a cutoff from the main H and D line at Benton, Minnesota, and leading directly to the city was constructed. This cutoff, appropriately named the Benton Cutoff, was established with the goal of linking Minneapolis and its nascent flour milling industry to the wheat of the West.[5] Construction on the Benton Cutoff began in 1879 and was completed in January of 1881. The Minneapolis portion of the line was constructed along Twenty-Ninth Street, on what was then the southern edge of the city. When the line was completed, service was made available not only to industry but to passengers as well.[6]

Despite the convenience provided by the Benton Cutoff, the growth of Minneapolis in population and area resulted in a change in perception of the rail line. When the Minneapolis portion of the line was constructed to follow along the southern edge of the city, only those citizens who worked near the line interacted with it with any frequency.[7] As the city expanded, however, and the city boundaries spread in all directions, the new southeast portion of the city eventually enveloped the line, causing those citizens who had taken up residence there to encounter the line daily. The residents of southeast Minneapolis viewed the line, at best, as a nuisance, due to the noise and smoke it generated and the industries it attracted, and at worst, as a death trap, due to the number of accidents and fatalities that occurred at the grade crossings.[8] Concern over the dangers posed by grade crossings was voiced as early as 1885,[9] and by 1905, the Minneapolis City Council (Council) faced a number of petitions for the elimination of grade crossings throughout the city.[10]

The response to these petitions did not come quickly due to the same points of contention that stifled action on the crossings prior to 1905, including the parties responsible for the cost of eliminating the crossings, the type of elimination (relocation, elevation, or depression of the tracks) to be used, and the order in which the various lines in Minneapolis should be modified.[11] Initially, prior to 1905, depression of the Minneapolis portion of the Benton Cutoff, referred to by Minneapolis residents as the more general "H and D line," had been agreed to by the CM and StP. An alderman, however, who felt that the railroad was not shouldering enough responsibility in the agreement, blocked this plan for grade separation. The CM and StP then tentatively offered to elevate the H and D line, but the residents of the eighth ward, which encompassed the Minneapolis portion of the line from Lake Calhoun to Chicago Avenue South, rejected this offer on the grounds that it would make the area unsightly.[12]

In 1905, the grade crossings issue, especially in regard to the H and D line, came back into public focus. For the next three years, it was the subject of several Council meetings and local newspaper articles.[13] In January of 1906, Andrew Rinker, the City Engineer, submitted a report to the Council's special committee on grade crossings. In this report, he recommended the elevation of the tracks and argued against their depression, citing such factors as property damage, effects on the sewer system, cost, and smoke. While acknowledging these factors, the editor of *The Minneapolis Journal*, in response to Rinker's report, stated that elevation of the tracks "is not a beautiful scheme. It disfigures the landscape and it appears to cut one part of the town off from the other. But curing grade crossings is admitted to be a life-saving process. It has nothing to do with the beautifying of cities."[14]

The next serious plan, however, to be considered for "curing" the H and D grade crossings had everything to do with the beautification of Minneapolis. In February of 1908, C. N. Chadbourn, a member of the Six O'clock Club men's society, presented a plan to aldermen, park commissioners, and private citizens for the relocation of the Minneapolis portion of the H and D line. Chadbourn, concerned with safety, but primarily with the "unkept and slatternly" industries that were continually cropping up along the H and D line, proposed that the right-of-way be purchased by the city and converted to a visually appealing boulevard that would connect the parks of Minneapolis with St. Paul. He felt that when the city replaced the tracks "by a broad boulevard attracting to its neighborhood a group of handsome dwellings, when we have connected our beautiful lake parks with our unsurpassed River drive, when we have constructed a convenient pleasure route to St. Paul and have connected our park system with that of our sister city, mutually exchanging these benefits with her, when we have made possible the use of the beautiful slopes of Powderhorn Park as a link in our park chain, will we not be many times

repaid for our effort and outlay?"[15] Over the next four months, a grade crossings committee was appointed by the city mayor, James C. Haynes, and included Chadbourn. The committee was charged with preparing plans to be submitted to the CM and StP for relocation of the tracks. To this end, in June of 1908, the committee put forth a report recommending several actions to facilitate their removal to another area of the city. These actions included the barring of new sidetracks that would connect with the H and D line, the discouragement of new industries along the line, the opposition of any plans for elevating the tracks, and the restriction of expenditures on improvements in the park near Lake Calhoun that would not be beneficial to the park once the railway was removed. They closed the report with a request to enlist "the help of all those who are interested in the building up of our city beautiful."[16] By April of 1909, however, the plan was temporarily "abandoned after a committee of citizens had labored some time with the officials of the [CM and StP],"[17] presumably because the railroad refused to move the tracks.

In the meantime, a second, more general plan for eliminating the grade crossings of the H and D line was brought into serious consideration in October of 1908, when the Minneapolis city engineer, Andrew Rinker, revealed that though the CM and StP continued to advance the idea of elevating the tracks, the railroad was also entertaining the idea of lowering the tracks.[18] The question of elevation versus depression was debated on the elevation side by the owners of industries located along the tracks and on the depression side by residents of properties in proximity to the tracks. The residents still felt that elevation of the tracks would be unsightly, and that it would cut south Minneapolis off from the rest of the city, while the manufacturers were concerned that depression of the tracks would force them to either lose their trackage or add a costly lower level to their facilities.[19] As this debate continued, in July of 1909, C. N. Chadbourn re-presented his plan to the Council grade crossings committee for relocation of the tracks in order to create a picturesque boulevard, and it was once again under consideration by the city, though the railroad would never seriously entertain the idea. The railroad would, however, present its share of plans over the next year, one involving the closing and vacating of several streets, one for elevation of the tracks, one for depression, and one for the use of the old H and D line between Cologne and Hastings, excluding Minneapolis from the route altogether.[20]

From 1909 through December of 1910, the decision of how to handle the grade crossings situation became the foremost issue facing the Council. Despite the concerns for public safety, the decision had been delayed since 1905 when the original plan for elevation was rejected on aesthetic grounds. This delay was due largely to the importance of the resolution of the grade crossings issue in determining the future appearance and development of the city, and these concerns, in turn, were due largely to the influence of the City Beautiful movement.

The City Beautiful movement was spawned by the "White City," which was built for the World's Columbian Exhibition of 1893 and served as a model for harmonious and unified urban aesthetics. The Exhibition "appeared at the moment when the urban network and business systems had been completed and attention began to turn toward improving the social and physical environment."[21] In general, the supporters of this movement "sought to improve their city through beautification, which would have a number of effects: 1) social ills would be swept away, as the beauty of the city would inspire civic loyalty and moral rectitude in the impoverished; 2) American cities would be brought to cultural parity with their European competitors through the use of the European Beaux-Arts idiom; and 3) a more inviting city center still would not bring the upper classes back to live, but certainly to work and spend money in the urban areas."[22] The mayor-appointed grade crossings committee clearly made reference to the movement in mentioning "our city beautiful" within their report on the relocation of the H and D tracks.[23] They were among the residents of Minneapolis, whose ideas were in line with this movement, who felt that a comprehensive plan for future city development, building, and beautification should be in place before a decision on the tracks was made.

Because of this sentiment, in January of 1910, a citizens' committee formed by members of and representing "a score of the influential civic bodies of Minneapolis,"[24] including the Commercial Club, the Chamber of Commerce, the Park Board, the North Side Commercial Club, the South Side Commercial Club, the St. Anthony Falls Commercial Club, the Engineers Club, the Municipal Art Commission, the Publicity Club, the Retail Merchants' Association, the Six O'clock Club, the Woman's Club, and the Labor and Trades Assembly elected eleven people to create a new citizens' commission: The Civic Commission of Minneapolis. In general, the purposes of the Civic Commission were to "investigate and report as to the advisability of any public works in the city of Minneapolis which in its opinion will tend to the convenience and well being of the people, the development of business facilities, the beautifying of the city, or the improvement of the same as a place of residence."[25] More specifically, however, the Civic Commission was formed with particular duties in mind, including a plan for resolving the grade separation problem in Minneapolis. As laid out by the citizens' committee, these duties were as follows:

> It should consider systematic methods of traffic communication by highways and railway transportation in relation to the present and future needs of the city; the underlying problems connected with elevation or depression of tracks; access to and communication between outer and inner parks and boulevards; the possible reclamation of river frontage; determination of sites for public buildings and any other investigations or inquiries, which in its judgment will best further the

interests of the city as a whole.

The recommendations of the committee should be embodied in a printed report which should be accompanied by a comprehensive civic plan, prepared by expert assistance.[26]

The model for the civic plan was the plan for the civic beautification of Chicago prepared by architects D. H. Burnham and Edward H. Bennett, a "working document [that gave] substance to the City Beautiful philosophy."[27] Burnham was the planner of the White City, the original "City Beautiful," while Bennett, his protégé, eventually developed plans for several cities, including Denver, Detroit, Portland, San Francisco, and Minneapolis. The idea of a civic plan was a new concept for the city of Minneapolis, as no semblance of a city planning department, formal or informal, had previously existed there. It was not until December 30, 1919, subsequent to the passing of an act by the state authorizing the creation of city planning departments, that the Minneapolis City Planning Department was formed.[28]

Three months after the creation of the Civic Commission, its members met with Edward H. Bennett to make an initial assessment and recommendations for Minneapolis, the general sentiment being that he would become the consulting engineer for the Commission. At this time, the "elimination of grade crossings and the building of proper railway terminals" were considered by the Civic Commission, the Council, and Mayor Haynes to be the most important of the issues to be addressed by the Commission.[29] Within three weeks, Bennett was selected as the designer for the civic beautification plan for Minneapolis, with the expectation that the final plan would contain a recommendation for the H and D tracks.[30] While the final plan did address the H and D tracks, it was not published until 1917, which was seven years too late.

In February of 1910, not long after the formation of the Civic Commission, the CM and StP presented a plan to the Council for depression of the H and D line in Minneapolis from the west side of Hiawatha Avenue to the east side of Irving Avenue, to occur immediately upon Council approval. The plan called for the construction of 37 "ornamental as well as useful"[31] bridges over the depressed track. Twenty-two of these bridges were to be at approximately street grade, while most of the remaining bridges were to be one to three feet above it. The bridge at Fremont Avenue would exhibit the greatest difference from street grade, at 12 feet above this level. The depressed track would lie within a 20-foot cut that relied upon sloping instead of retaining walls to prevent collapse, and it would allow for 18 feet of headroom under all of the bridges.[32] At the time the plan was presented, the Civic Commission asked for postponement of a decision until they could bring in a city planner, and after Bennett was hired as the city planner, they requested

that the Council wait until his plan was received at the expected time, December of 1910.[33] The requested delay was due primarily to the desire of the Commission to fully explore whether the CM and StP might yet consent to the relocation of the tracks.[34] Throughout the year, however, the CM and StP held fast to their plan for track depression and never gave consideration to the plan for relocation of the tracks. With relocation of the tracks no longer a viable option, the Council's grade crossings committee met with the Civic Commission on December 19, 1910,[35] and on December 20, 1910, with the endorsement of the Civic Commission, the grade crossings committee recommended passage of an ordinance that required the railroad's plan for track depression to occur.[36] Ten days later, the Council passed the ordinance.[37] Preliminary work for the depression involving the laying of temporary sidetracks began on April 29, 1911,[38] and excavation for the depression began on June 19 of the same year.[39] The bridges over the tracks, 37 in all, were constructed with a uniform design of reinforced concrete and architectural details in the Classical Revival Style. The CM and StP completed the depression of the line and the construction of bridges over it by 1916.

Conclusion

The CM and StP grade separation project on their H and D line was carried out between 1912 and 1916 and represents the culmination of efforts by the citizens, city government, and city planners of Minneapolis to direct the future growth and appearance of south Minneapolis while ensuring the safety of its residents and maintaining economically necessary industrial interests. As the residential areas of the city began to expand in the late nineteenth and early twentieth centuries, movement between residence and workplace would become perilous due to the presence of the previously constructed H and D line through south Minneapolis. An immediate solution to the grade crossings problem for the sake of safety, however, was forgone due to the desire of residents and officials to guide city planning in an appropriate and attractive direction. The debate over the form of the grade separation, therefore, extended over several years. That the importance of the resolution of this debate lay in the areas of city planning and urban aesthetics is indicated by the creation of the Civic Commission of Minneapolis during the period of the debate, one of whose main goals was to address grade separation in the context of a comprehensive civic plan; the hiring of Edward H. Bennett, a leader of the City Beautiful Movement, to preside over this commission and design the civic plan; and the final design of the H and D line grade separation project, approved by the City Council and the Civic Commission, as a depressed rail corridor with ornamental bridges. For these reasons, the CM and StP Grade Separation Historic District in Minneapolis is eligible for the National Register of Historic Places under Criterion A for its local significance in the area of community planning and development.

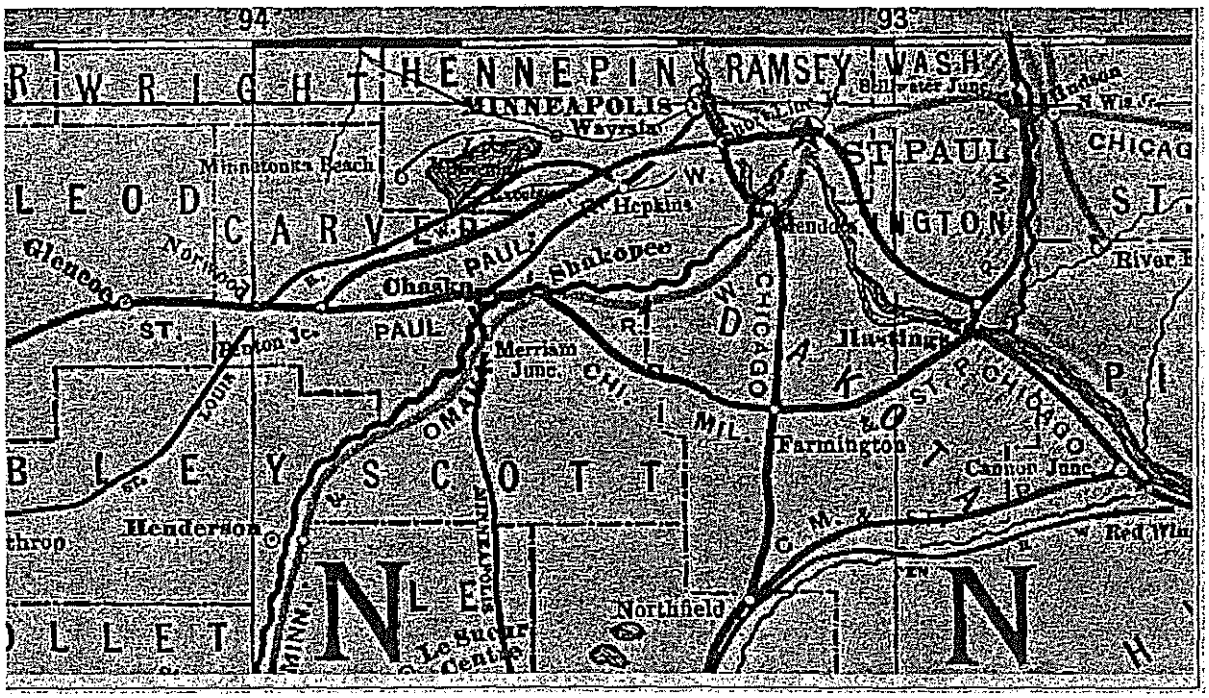
Notes

[1] Robert B. Adam, *History of the Abolition of Railroad Grade Crossings in the City of Buffalo*, Publications of the Buffalo Historical Society, ed. Frank H. Severance (Buffalo: Buffalo Historical Society, 1905), 154.
[2] "Grade Crossing Elimination in Cities," *The Railway and Engineering Review* 53 (1913):1148-1150; "Grade Separation Laws and Requirements," *Railway Age Gazette* 55 (1913):1118-1121.
[3] C. N.. Bainbridge, "A Study of Grade Crossing Elimination in Cities," *Railway Age Gazette* 59 (1915): 45.
[4] "Grade Crossing Elimination," 47.
[5] John C. Luecke, *Dreams, Disasters, and Demise: The Milwaukee Road in Minnesota* (Eagan: Grenadier Publications, 1988), 84-5.
[6] Ibid., 84.
[7] "Plan on Foot to Remedy 29th. St. Grade Crossing," *Minneapolis Journal*, 16 February 1908.
[8] Ibid.; "Fight Grade Crossings," 7 January 1905.
[9] "Fight Has Been On Twenty Years," *Minneapolis Journal*, 14 January 1905.
[10] "Fight Grade Crossings," *Minneapolis Journal*, 7 January 1905; Editorial, 20 January 1905.
[11] "Fight Has Been On," *Minneapolis Journal*, 14 January 1905; "The Grade Crossing Problem," 26 January 1905; "Has Own Plan on Safe Crossings," 7 March 1906; "Council Considers Grade Crossings," 23 December 1910.
[12] "Fight Has Been On," *Minneapolis Journal*, 14 January 1905.
[13] "Grade Crossings and the School Children," *Minneapolis Journal*, 20 January 1905; "Council Looking Into the Future," 9 February 1905; "A Duty of the Hour," 15 February 1905; "Solons Junket on a Flat Car," 29 May 1905; "Making Some Progress," 8 June 1905.
[14] "Grade Crossings," *Minneapolis Journal*, 8 March 1906.
[15] "Plan on Foot," *Minneapolis Journal*, 16 February 1908.
[16] "Committee Urges Removal of Track," *Minneapolis Journal*, 13 June 1908.
[17] "Quick Action on Grade Crossings," *Minneapolis Journal*, 27 April 1909.
[18] "Shall Tracks be Put Up or Down?" *Minneapolis Journal*, 19 October 1908.
[19] "Declare for Low Grades," *Minneapolis Journal*, 19 May 1909; "Want Tracks Elevated," 2 July 1909.
[20] "Officials Study Track Question," *Minneapolis Journal*, 17 July 1909; "Elevation is Milwaukee Plan," 12 August 1909; "Milwaukee Would Close 19 Streets," 19 August 1909; "May Run Trains Through Hastings," 14 September 1909; "Milwaukee Offers to Lower Tracks," 4 February 1910.

[21] Leland M. Roth, *A Concise History of American Architecture* (New York: Harper and Row, 1979), 220.
[22] Julie K. Rose, "The City Beautiful Movement," [online], The University of Virginia, 1996. Available from World Wide Web: (http://xroads.virginia.edu/~CAP/CITYBEAUTIFUL/dchome.html).
[23] "Committee Urges Removal," *Minneapolis Journal*, 13 June 1908.
[24] "Name Commission for Better City," *Minneapolis Journal*, 8 January 1910.
[25] Ibid.
[26] Ibid.
[27] U.S. National Archives and Records Administration, "Preserving Architectural Collections at the Art Institute of Chicago," [online], U.S. National Archives and Records Administration, 1998. Available from World Wide Web: (http://www.archives.gov/grants/annotation/september_98/architectural_chicago.html).
[28] Council Proceedings Minneapolis 1919 v. 39.
[29] "Question of Crossings is Coming Next," *Minneapolis Journal*, 10 April 1910.
[30] "Crossing Problem up to Aldermen," *Minneapolis Journal*, 1 May 1910.
[31] "Milwaukee Offers to Lower Tracks," *Minneapolis Journal*, 4 February 1910.
[32] Ibid.
[33] "Oppose Plan for Track Depression," *Minneapolis Journal*, 5 February 1910; Track Depression is Delayed," 15 March 1910; "Politics Enter Crossing Problem," 3 May 1910; "May Request Delay," 20 July 1910.
[34] "May Request Delay," *Minneapolis Journal*, 20 July 1910.
[35] Council Proceedings Minneapolis 1910 v. 38, 1033.
[36] "Track Depression is Recommended," *Minneapolis Journal*, 21 December 1910; "Council Considers Grade Crossings," *Minneapolis Journal*, 23 December 1910.
[37] "Council Moves to Lower Tracks," *Minneapolis Journal*, 31 December 1910.
[38] "Road Begins Depression," *Minneapolis Journal*, 30 April 1911.
[39] "Shippers Enjoin Track Lowering," *Minneapolis Journal*, 23 June 1911.

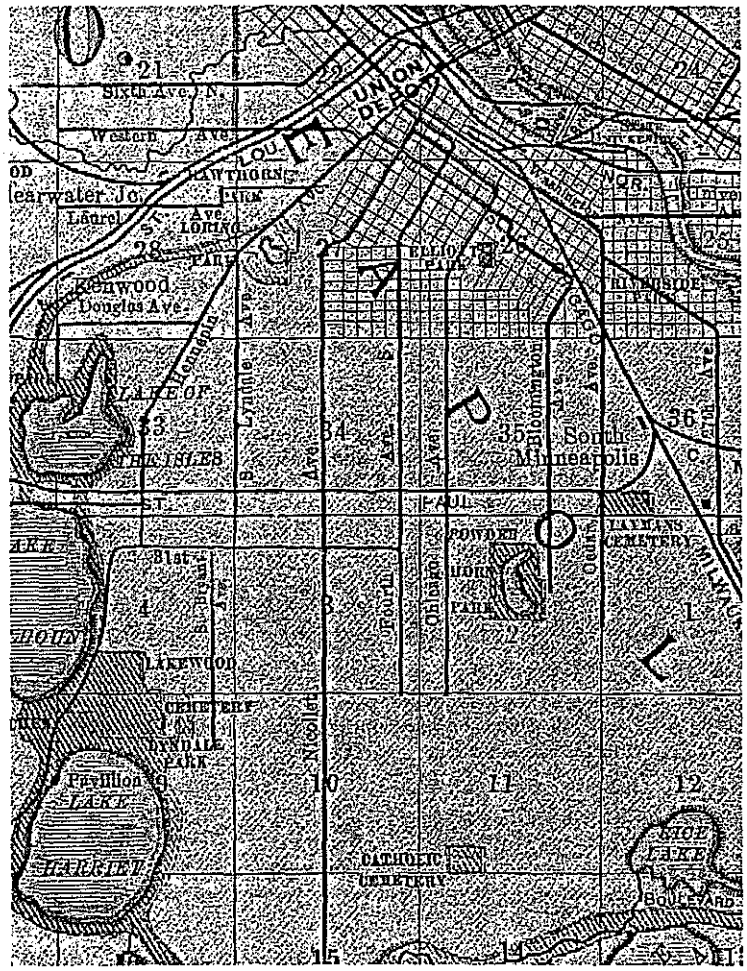
United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet



1883 map illustrating a portion (Glencoe to Hastings) of the H and D line and the Benton Cutoff (Benton Jc. to south Minneapolis).

Rand McNally and Company
1883 *Chicago, Burlington & Quincy R.R. and Intersecting Lines, 1883.* Rand McNally and Company, Chicago.



1897 map illustrating the location of the Chicago Milwaukee and St. Paul Grade Separation within Minneapolis. The location is marked by the black line running from Hennepin Avenue southeast of Lake of the Isles to its connection with the Chicago Milwaukee and St. Paul Short Line, north of Layman's Cemetery.

Rand McNally and Company
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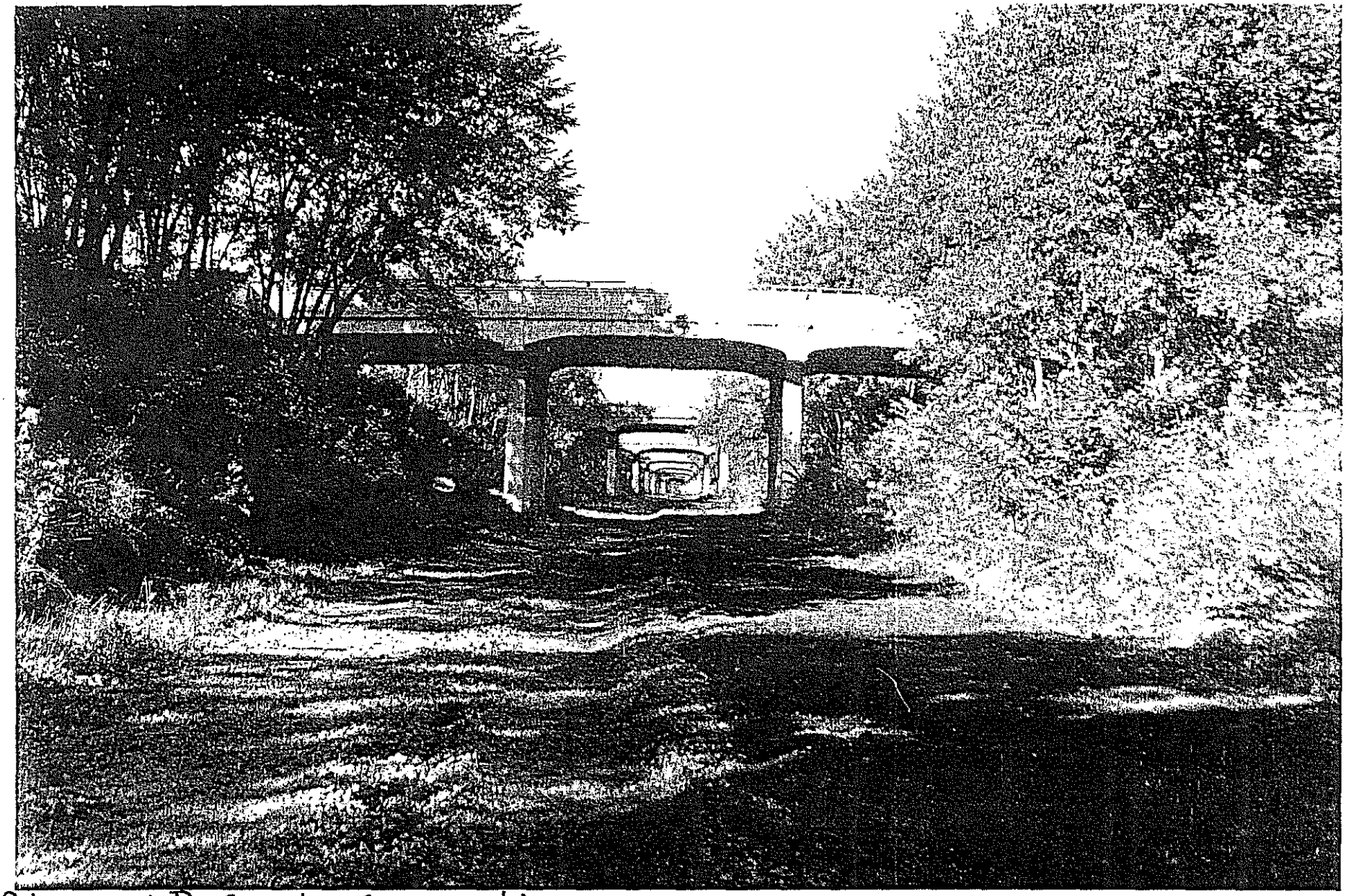
Verbal Boundary Description

The boundary of the CM and StP Grade Separation Historic District is shown on the accompanying map entitled "District Boundary, Photo Key and Sketch Map, 2004."

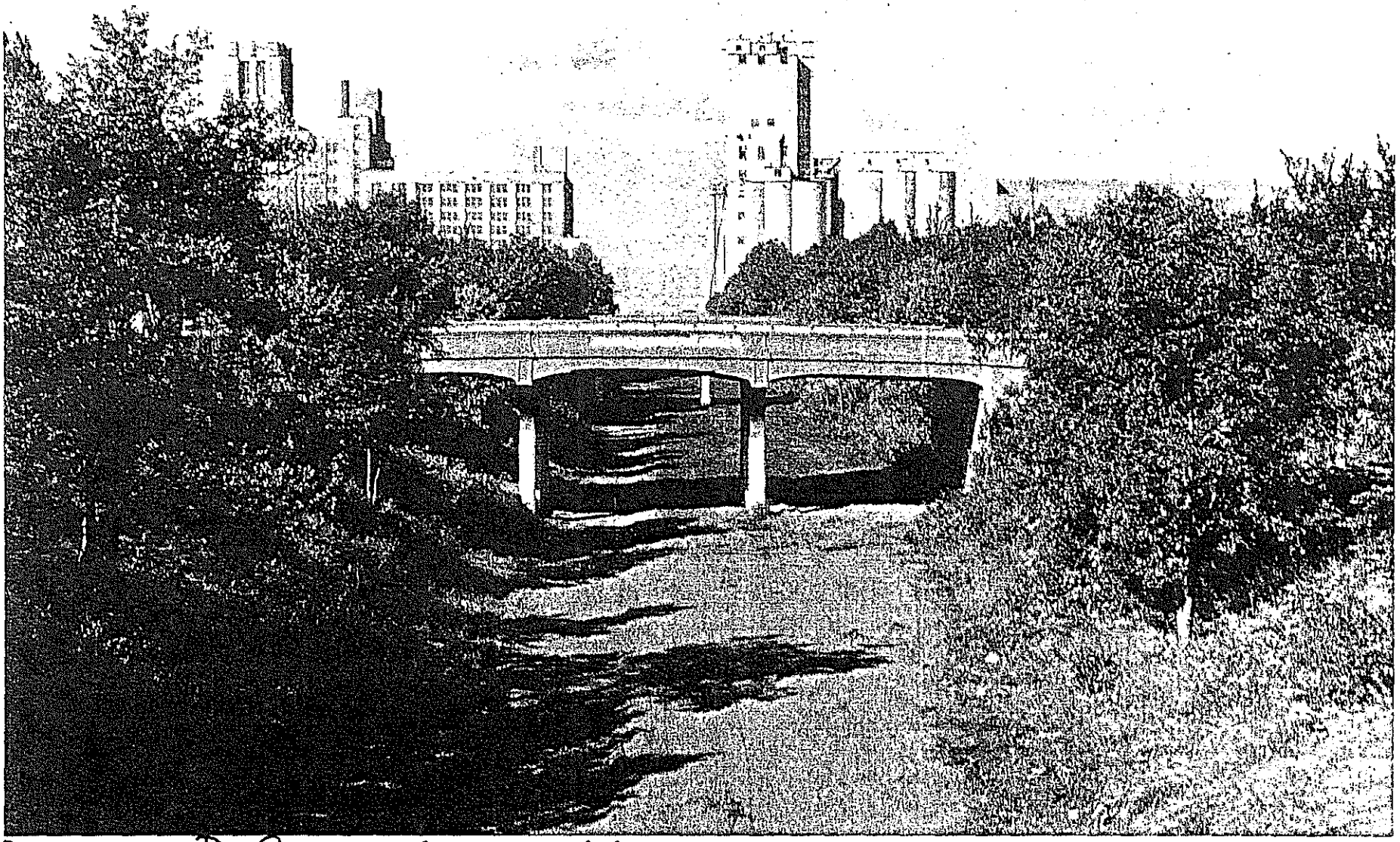
Boundary Justification

The CM and StP Grade Separation Historic District is a transportation district including a depressed railroad corridor trench and several adjacent buildings forming an irregular polygon. The boundaries for the district are defined, in part, by the historical property ownership by the CM and StP Railroad Company during the period of significance, between the eastern right-of-way of Humboldt Avenue South (as the western boundary) and the southern right-of-way of East Twenty-Eighth Street, where the railroad right-of-way meets the street (as the eastern boundary). In the areas where the seven adjoining buildings form the sidewalls of the depressed railroad trench, the boundary extends to include these buildings and the parcels with which they are historically associated. The boundary encompasses the area of land that contains the contributing resources—trench, bridges, buildings, and small-scale features that comprise the historic district.



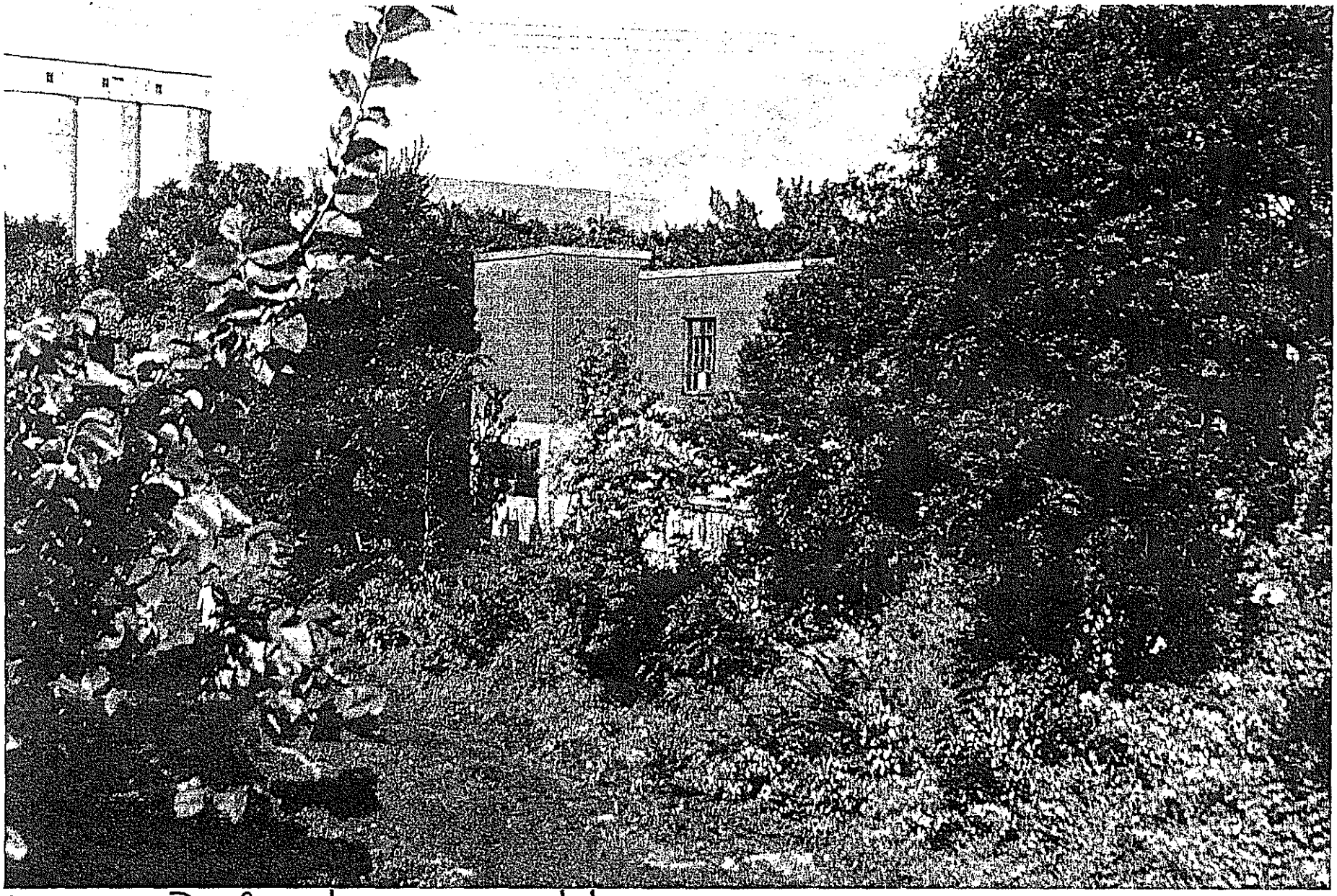
CM+StP Grade Separation
Hennepin Co., Mn
014508- 4/4A

Looking W. from 18th Av to Bloomington Av



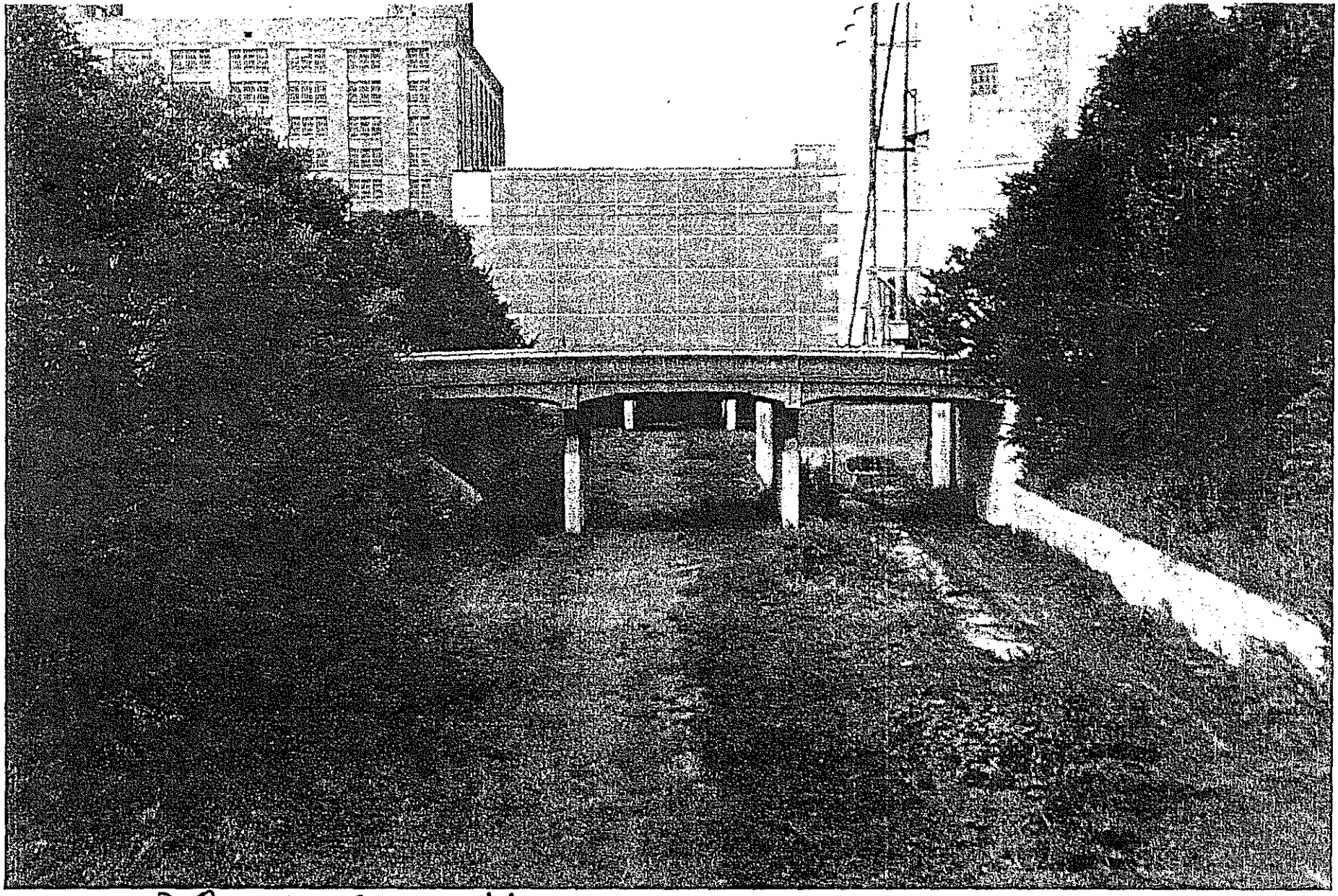
CM+St P Grade Separation
Hennepin Co., Mn
014508-11/11A

Looking W. at 14th Av Bridge



CM+STP Grade Separation
Hennepin Co., Mn
014508 - 15/15A

Looking NW at Dayton Rogers Manufacturing Co, 2820 13th Av S.

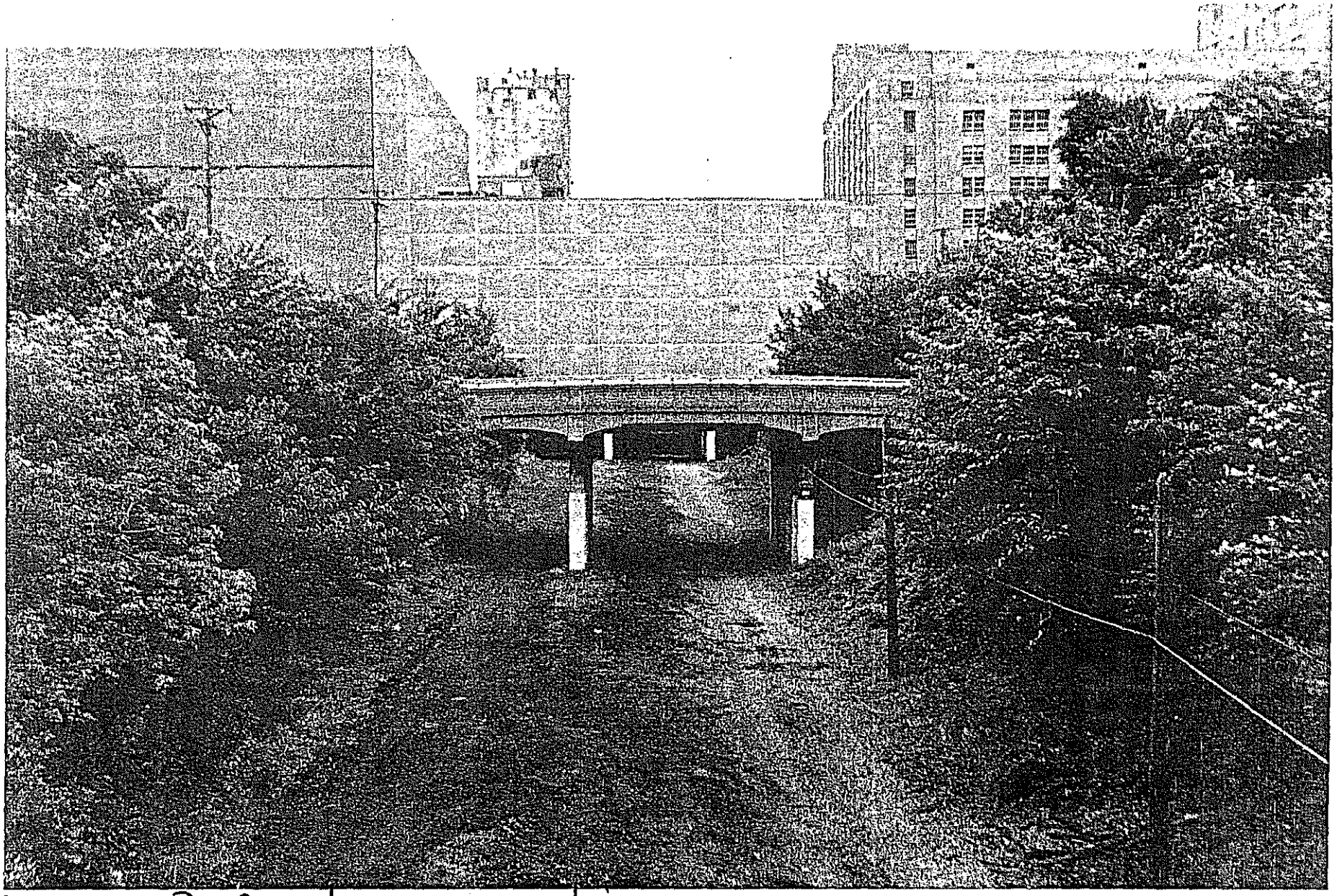


CM+ StP Grade Separation
Hennepin Co., Mn
014508 - 18/18A

Looking W. from 12th Av to 10th Av S. at 1964 addition to Sears, 2929 Chicago Av S.

CM+St P Grade Separation
Hennepin Co., MN
014508-23/23A

Looking SW at Sears, 2929 Chicago Av S.

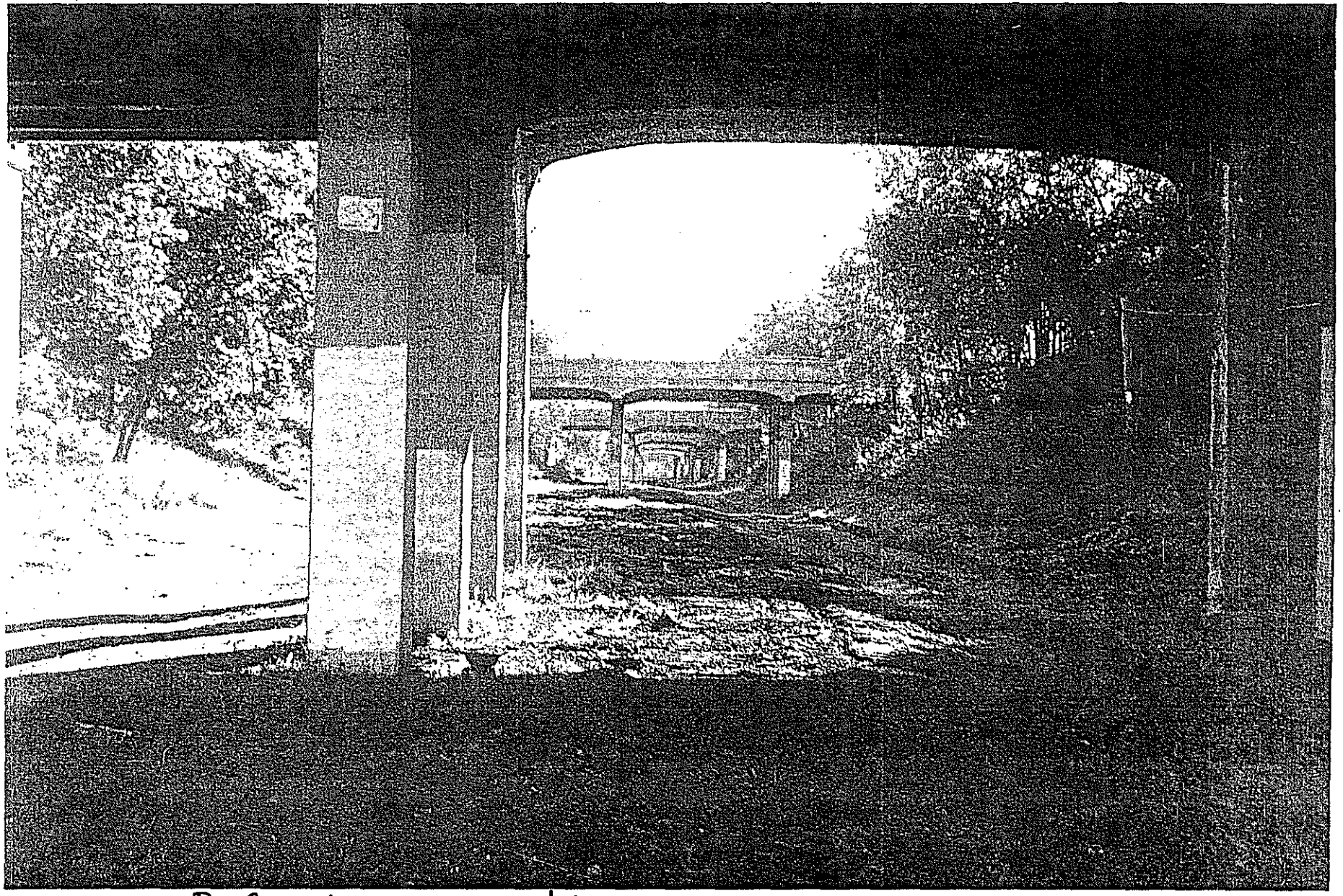


CM+STP Grade Separation
Hennepin Co., Mn
014509- 4/4A

Looking E. at Chicago Av. Bridge, 1964 Addition to Sears, 2929 Chicago Av S in the background

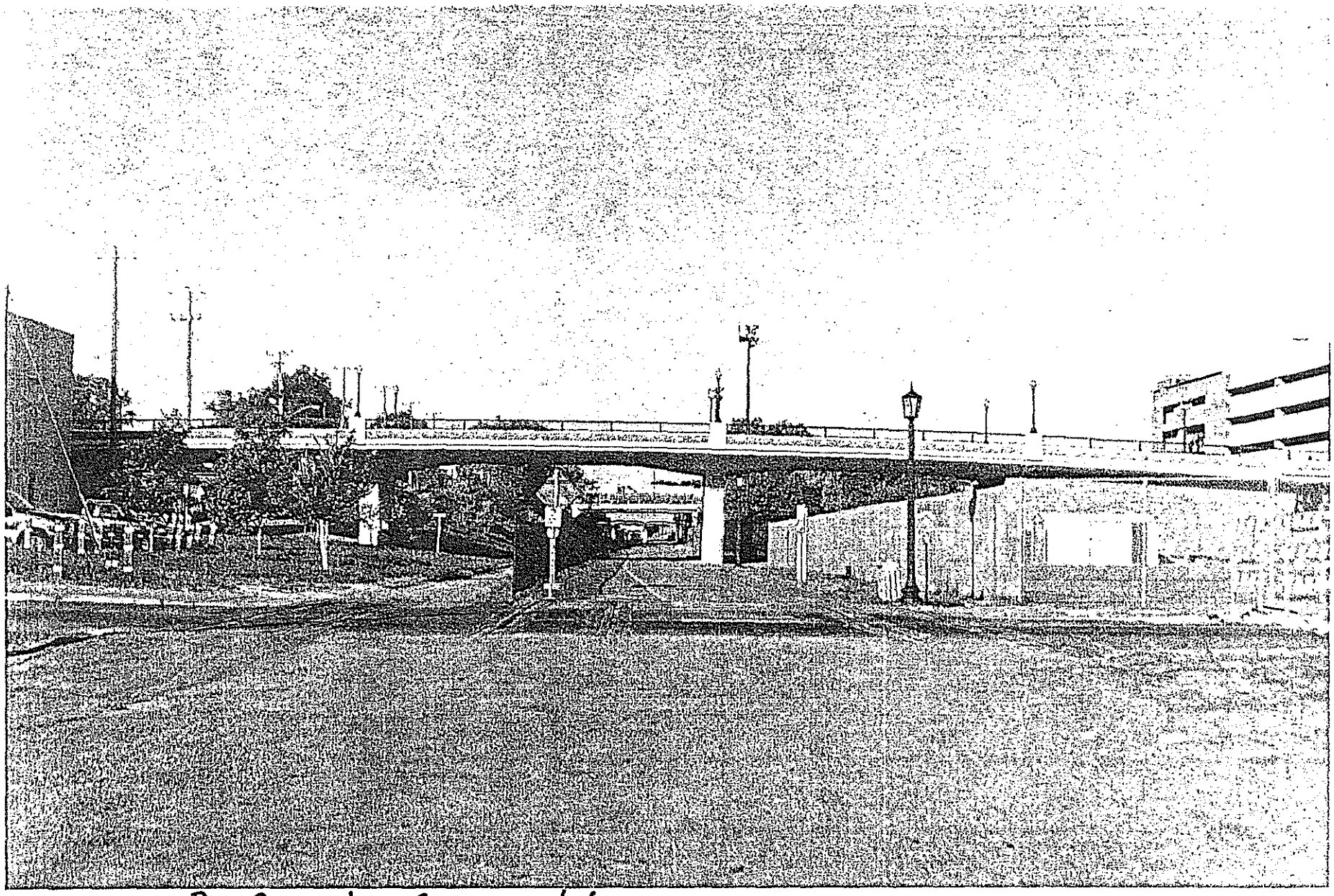
CM+StP Grade Separation
Hennepin Co., Mn
014509-818A

Looking W. at Portland Av. Bridge



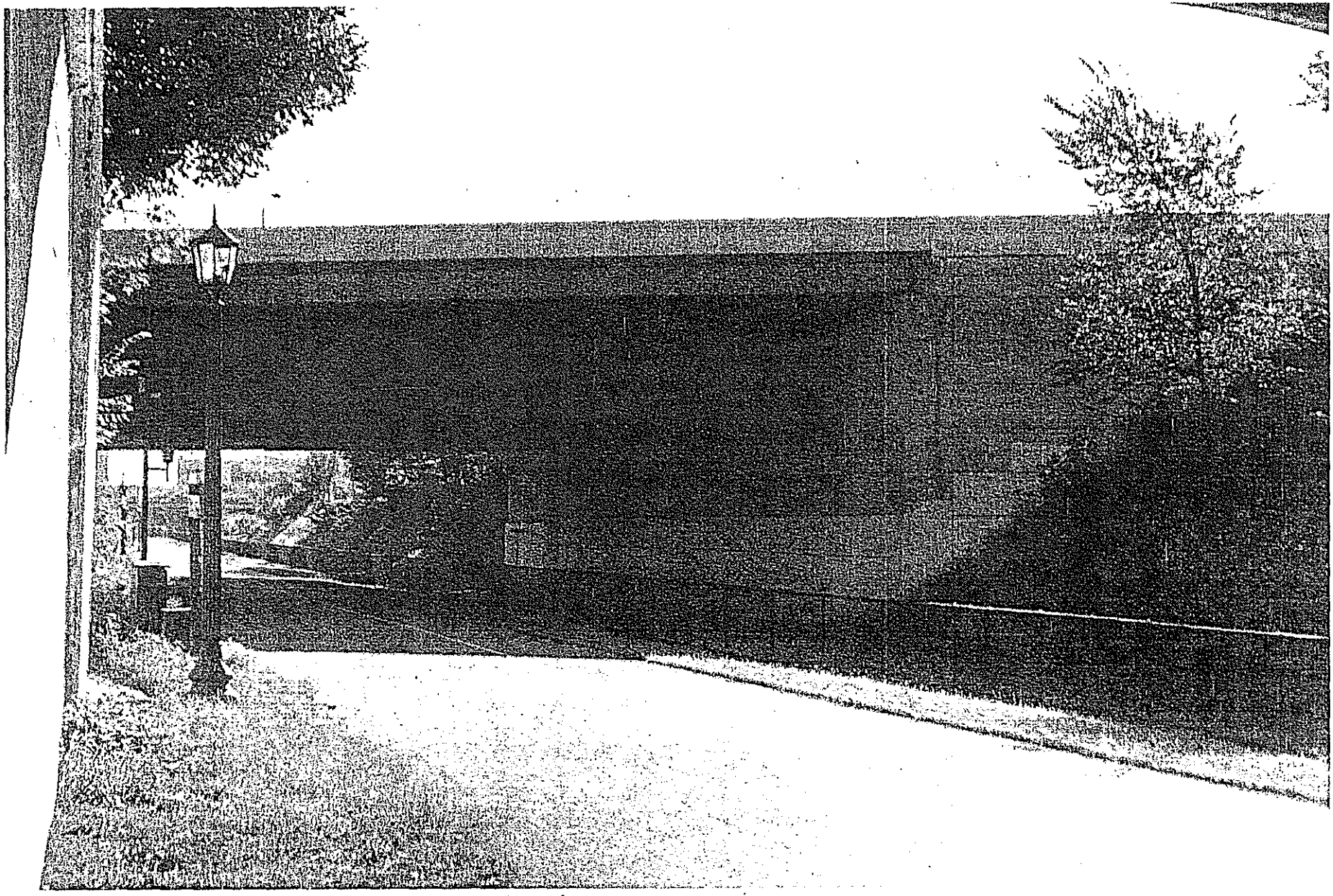
CM+ St P Grade Separation
Hennepin Co., Mn
014509- 11/11A

Looking E. from Portland Av.



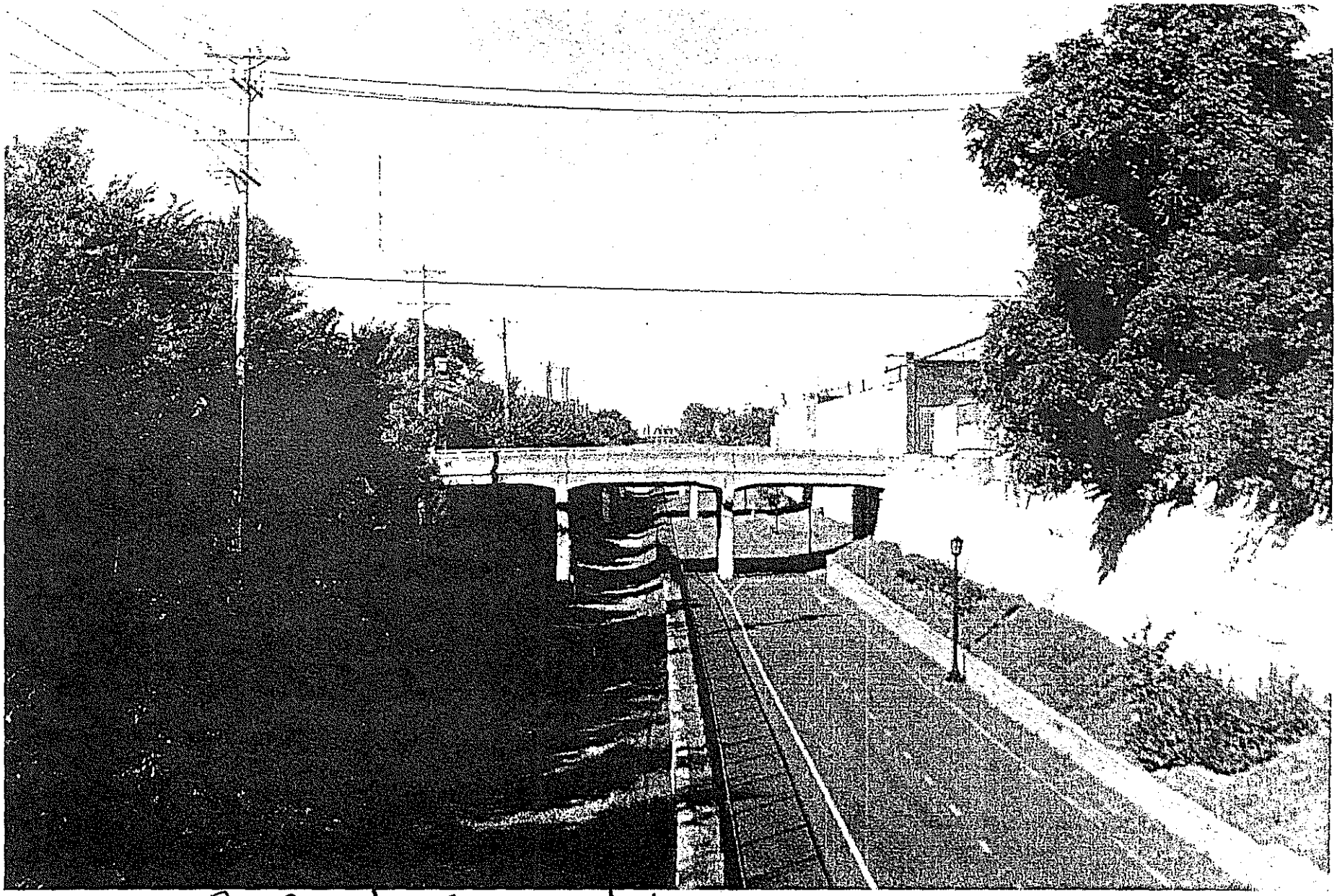
CM&StP Grade Separation
Hennepin Co., Mn
014509-14/14A

Looking W. at 4th Av. Bridge



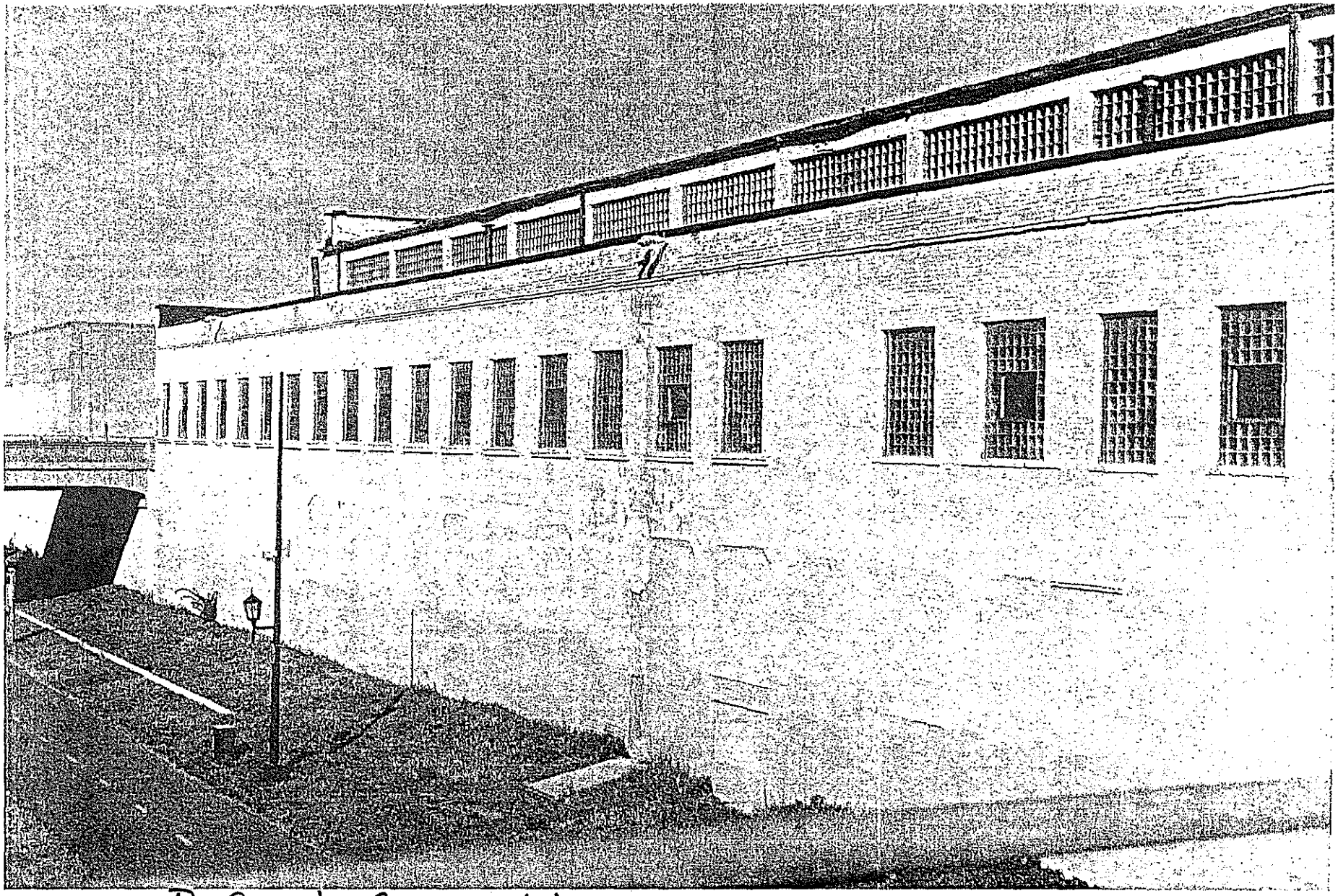
CM & StP Grade Separation
Hennepin Co., Mn
014509- 18/18A

Looking E. at I-35 W Bridge



C M & St P Grade Separation
Hennepin Co., Mn
014510-0A

Looking W. at Pleasant Av. Bridge

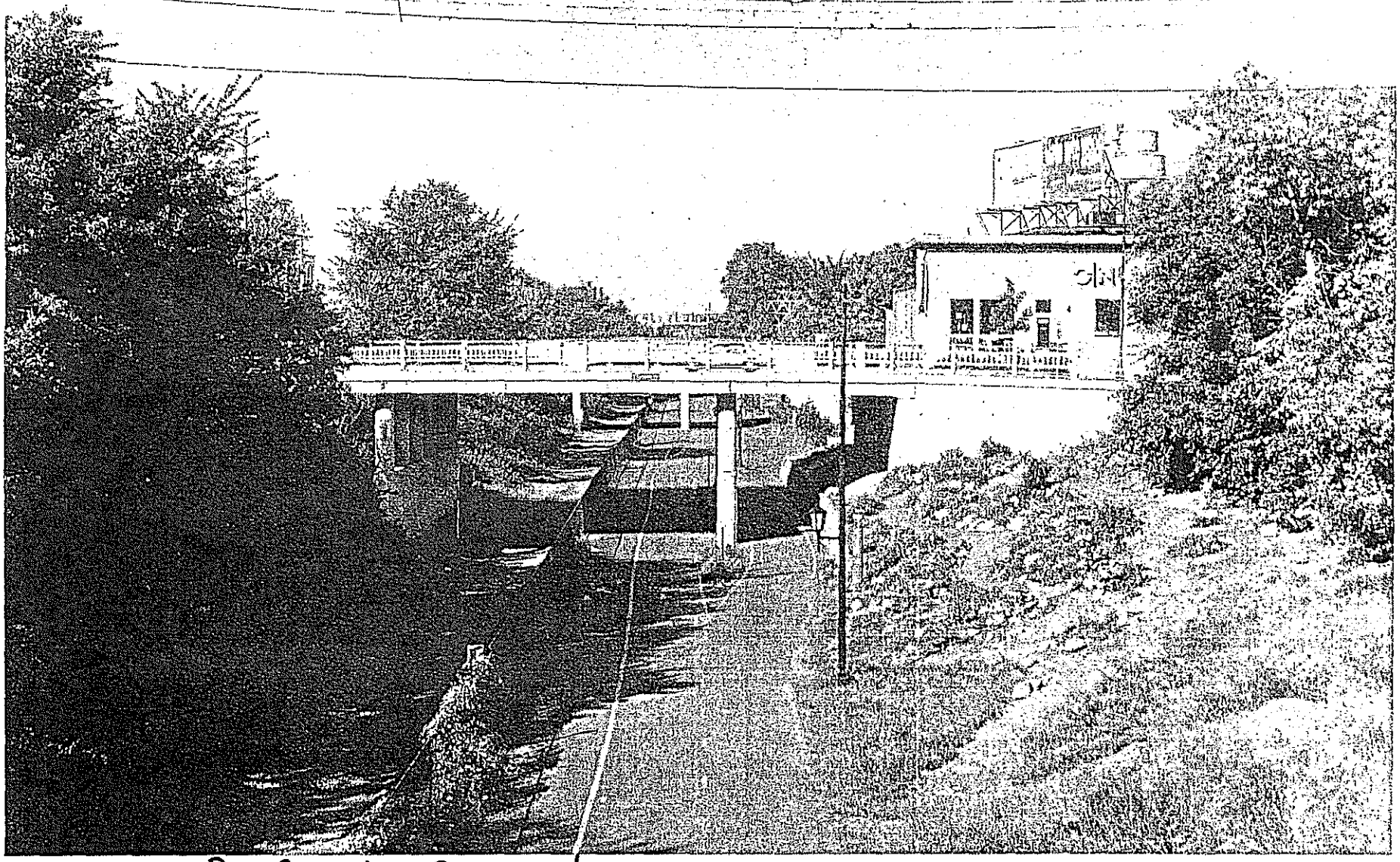


C M+ St P Grade Separation
Hennepin Co., Mn
014510-1A

Looking NW at Western Alloyed Steel Casting Co., 2848 Pleasant Av.

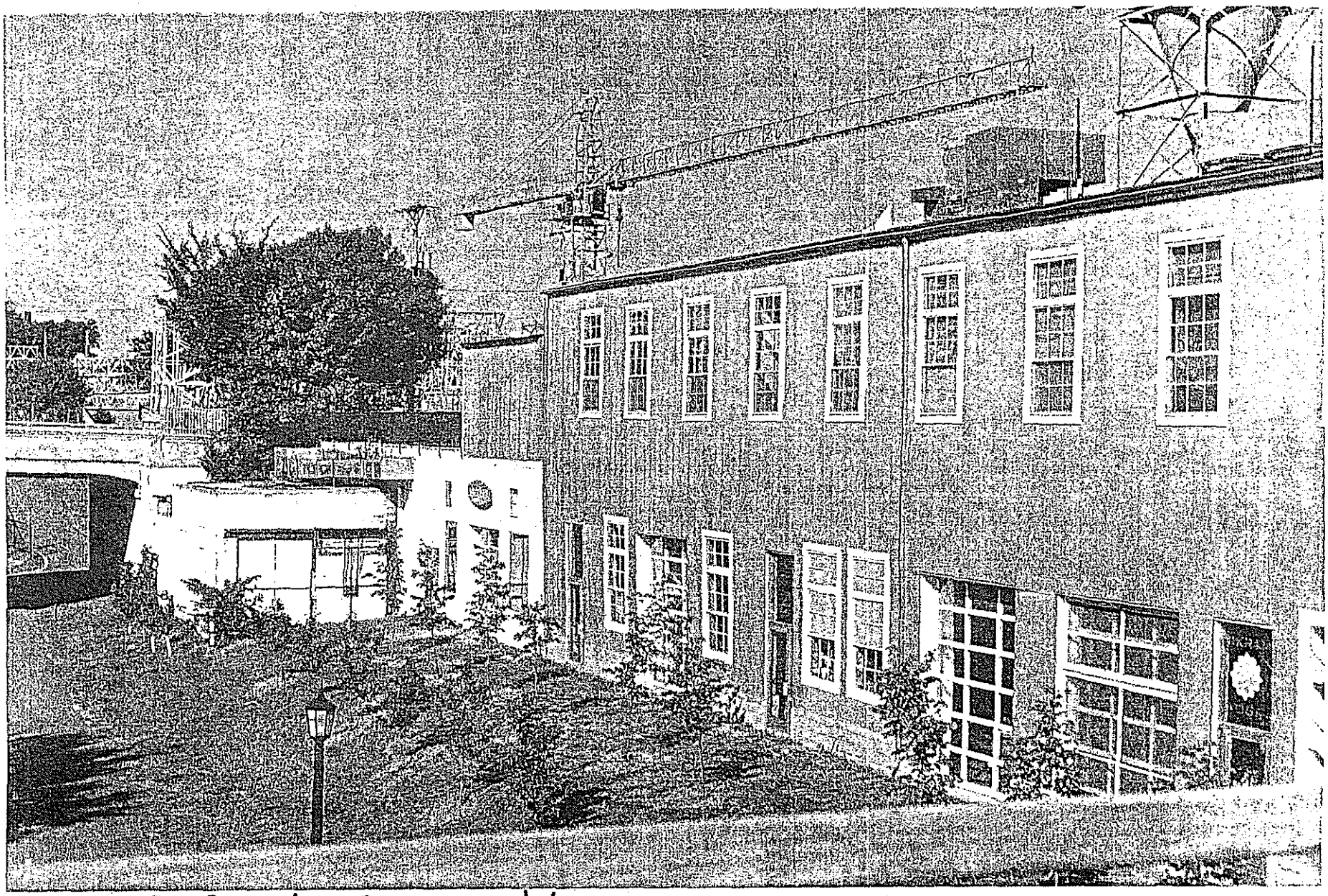
CM&StP Grade Separation
Hennepin Co., Mn
014510 - 5A/6

Looking SW at east half of Eighth Ward Warehouse, 2900 Pleasant Av S.



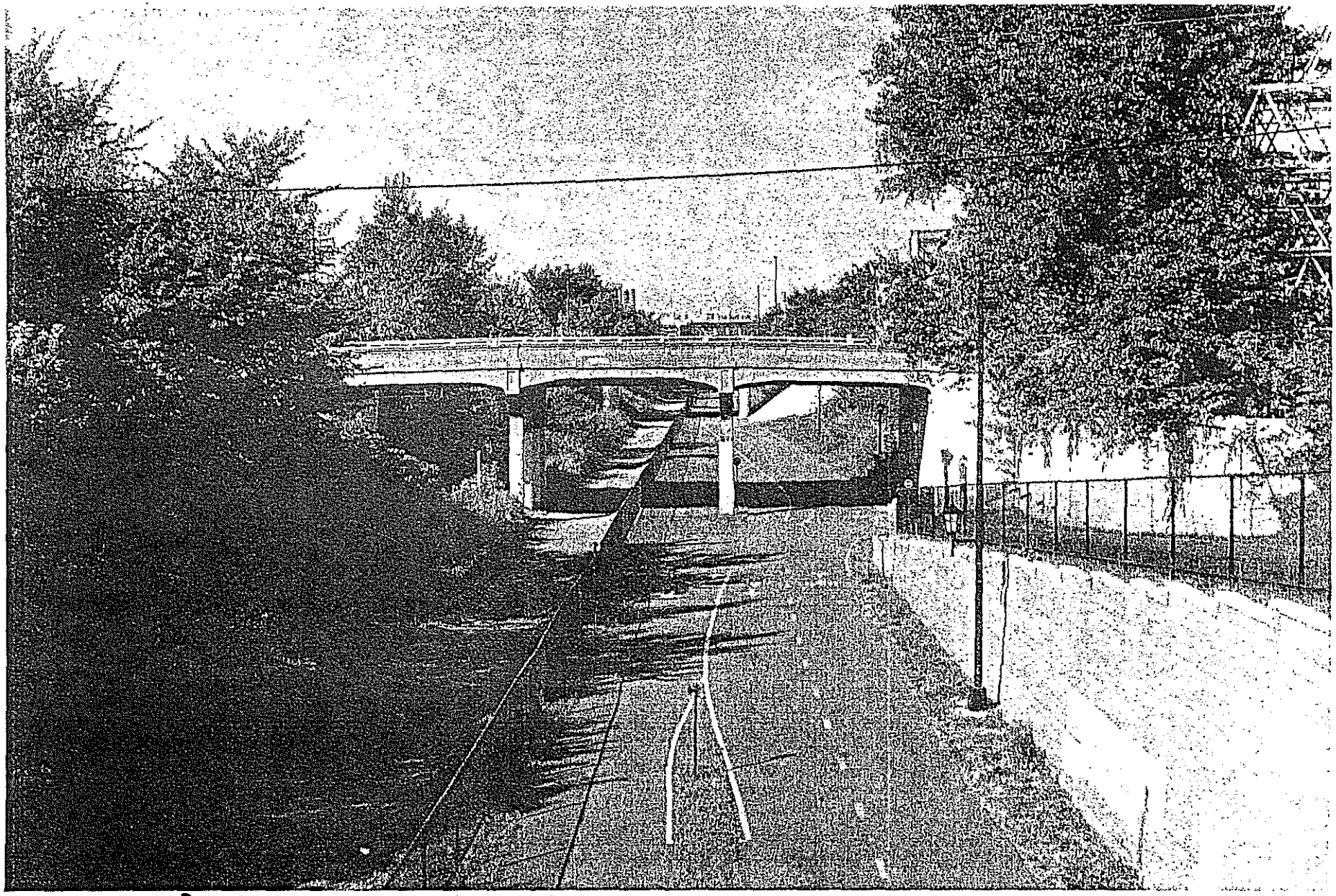
CM + St P Grade Separation
Hennepin Co., Mn
014510- 9A110

Looking W. at Lyndale Av. Bridge



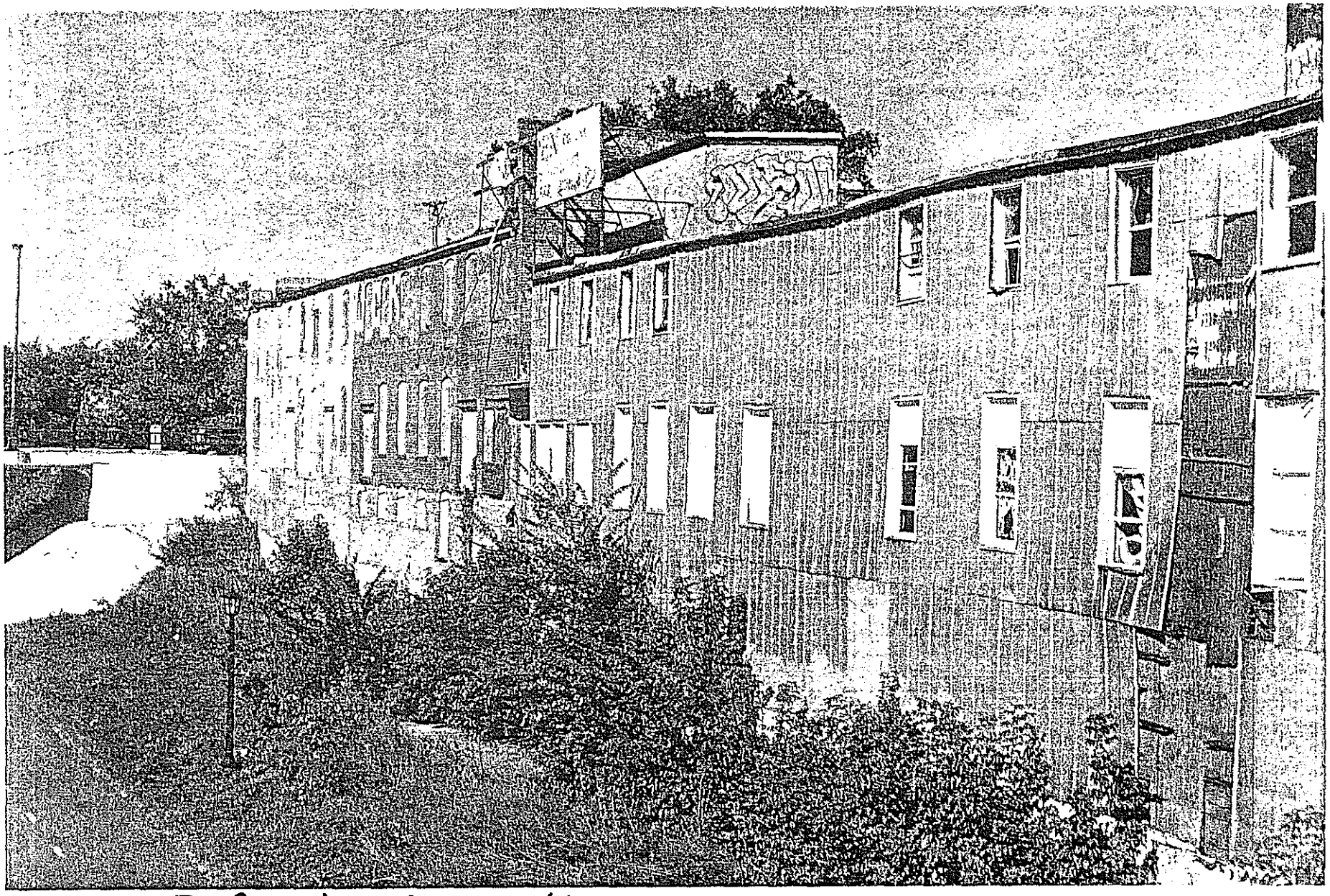
C M+ St P Grade Separation
Hennepin Co., MN
014510 - 10A/11

Looking NW at Bruer Bros. Lumber Co., 2836 Lyndale Av S.



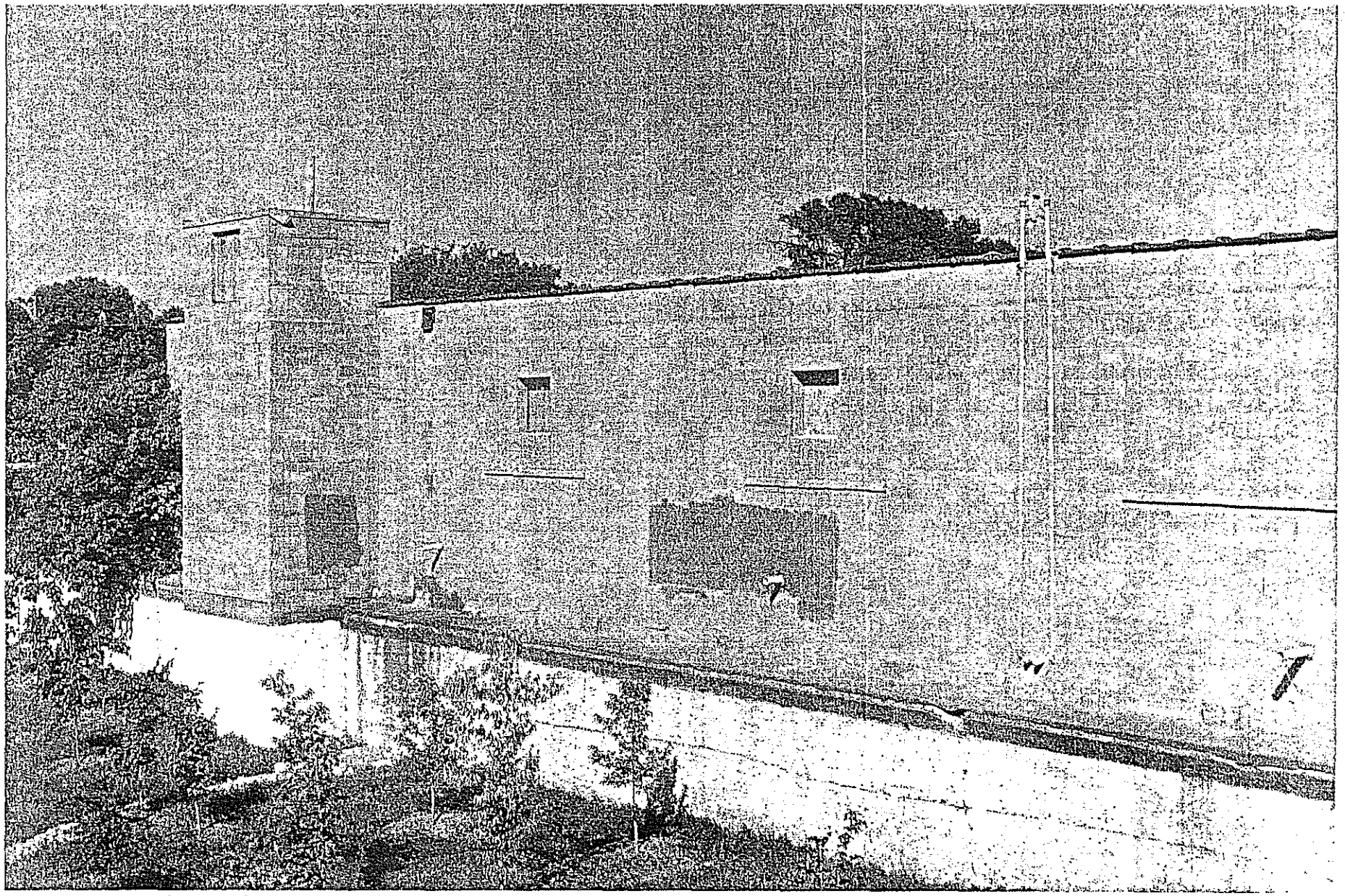
CM&StP Grade Separation
Hennepin Co., Mn
014510-15A/16

Looking W at Bryant Av Bridge



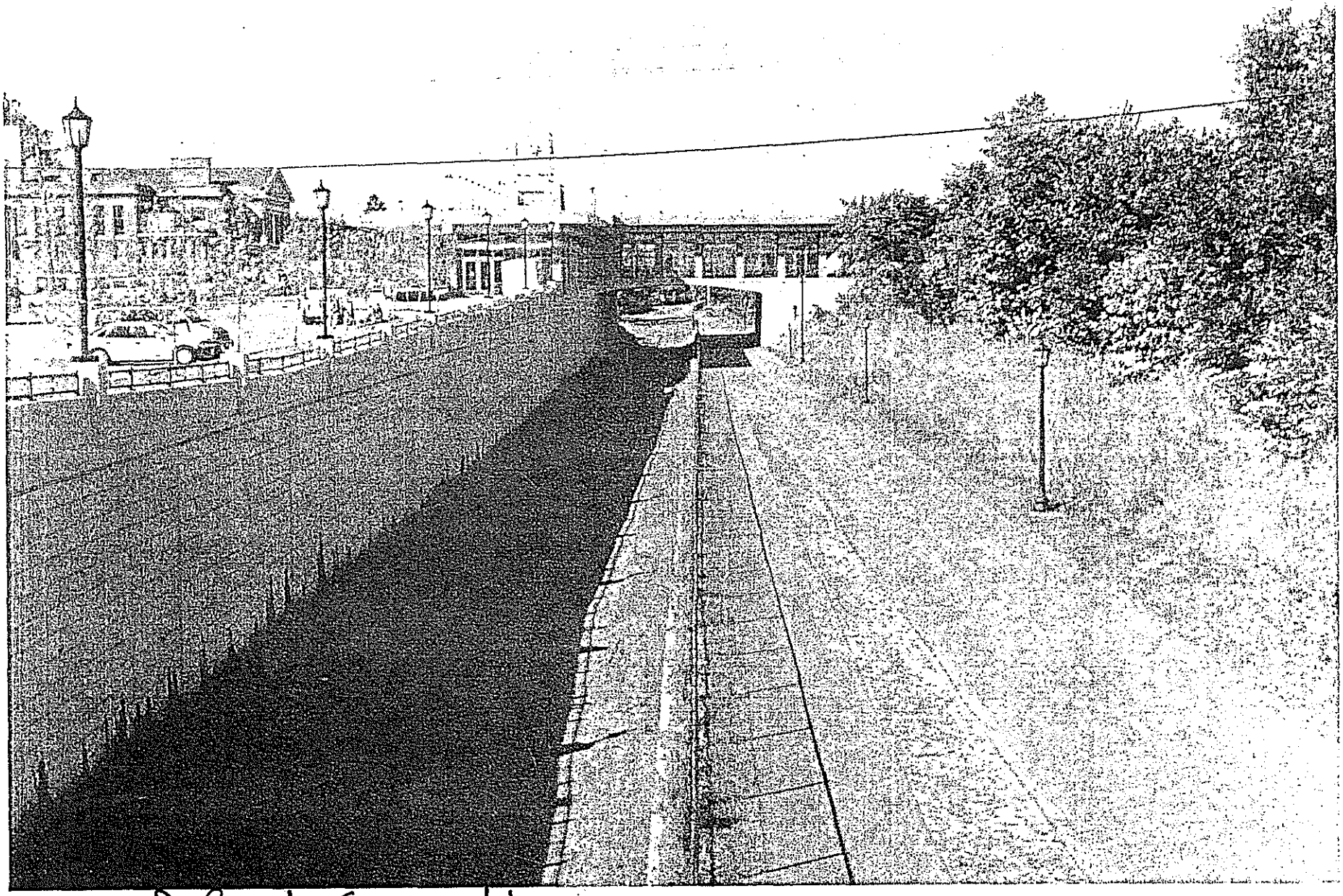
CM+StP Grade Separation
Hennepin Co., Mn
014510-16A/17

Looking NW at west half of Twin City Separator Co.,
2841 Dupont Av S.



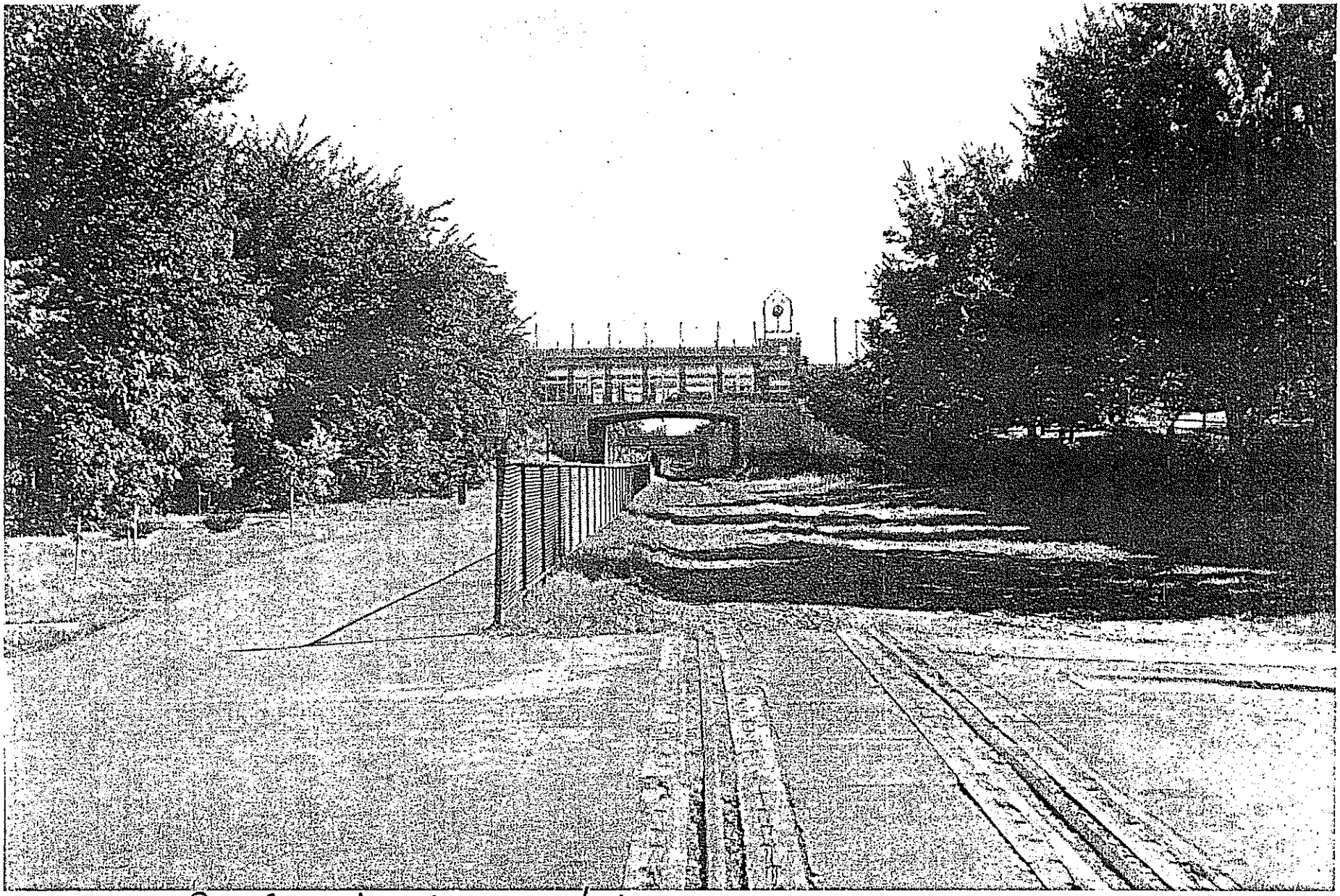
CM&StP Grade Separation
Hennepin Co., Mn
014510-22A/23

Looking NW at Norris Creameries, 2828 Emerson Av S.



CM+StP Grade Separation
Hennepin Co., MN
014510-24A

Looking W. from Fremont Av S. to Hennepin Av. Bridge



CM+St P Grade Separation
Hennepin Co., Mn
014511- 1A/2

Looking E. at Hennepin Av. Bridge

CM & St P GRADE SEPARATION

HENNEPIN CO., MN

Looking E. Colfax Ave. Bridge at bottom of photo

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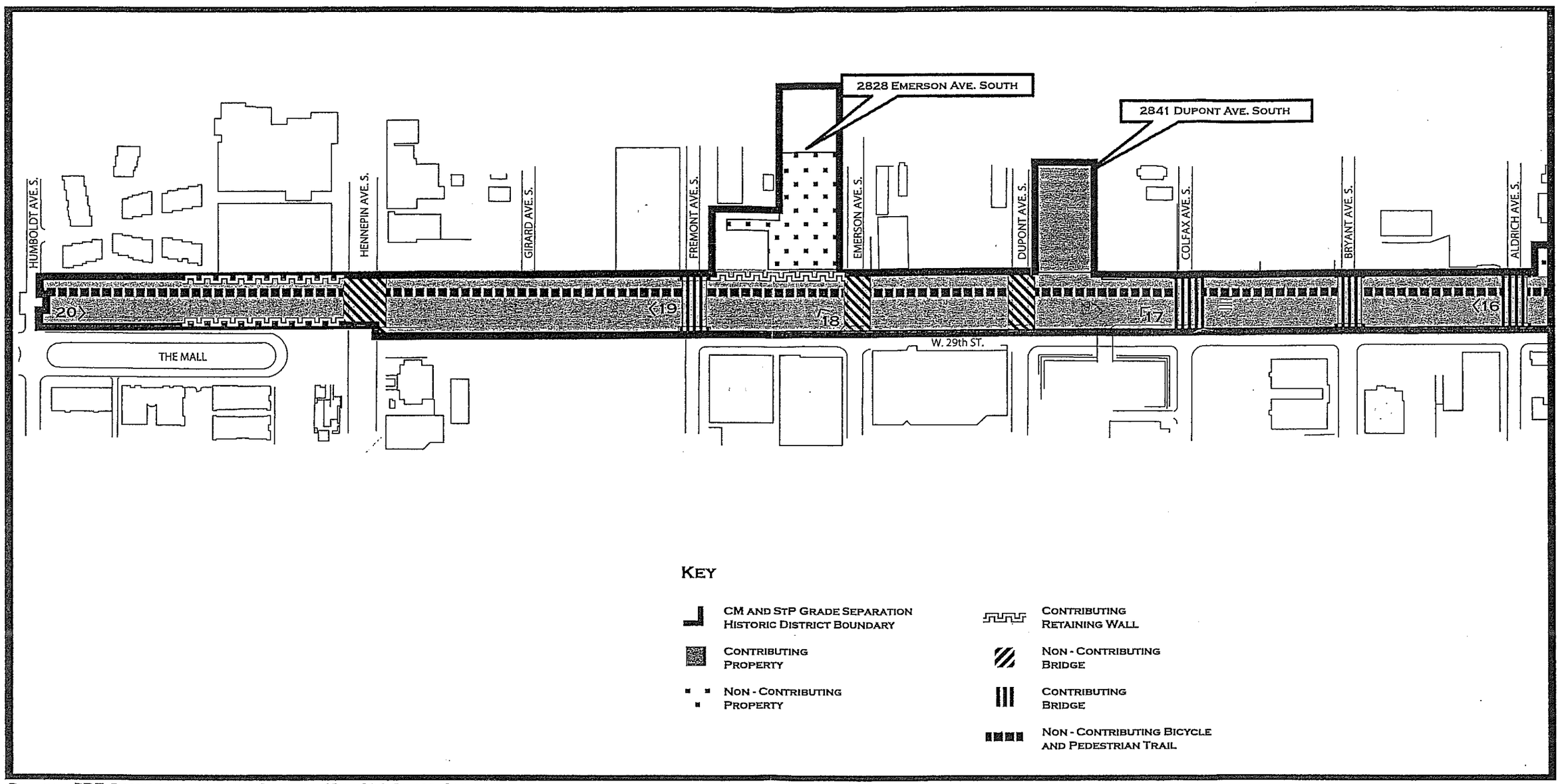
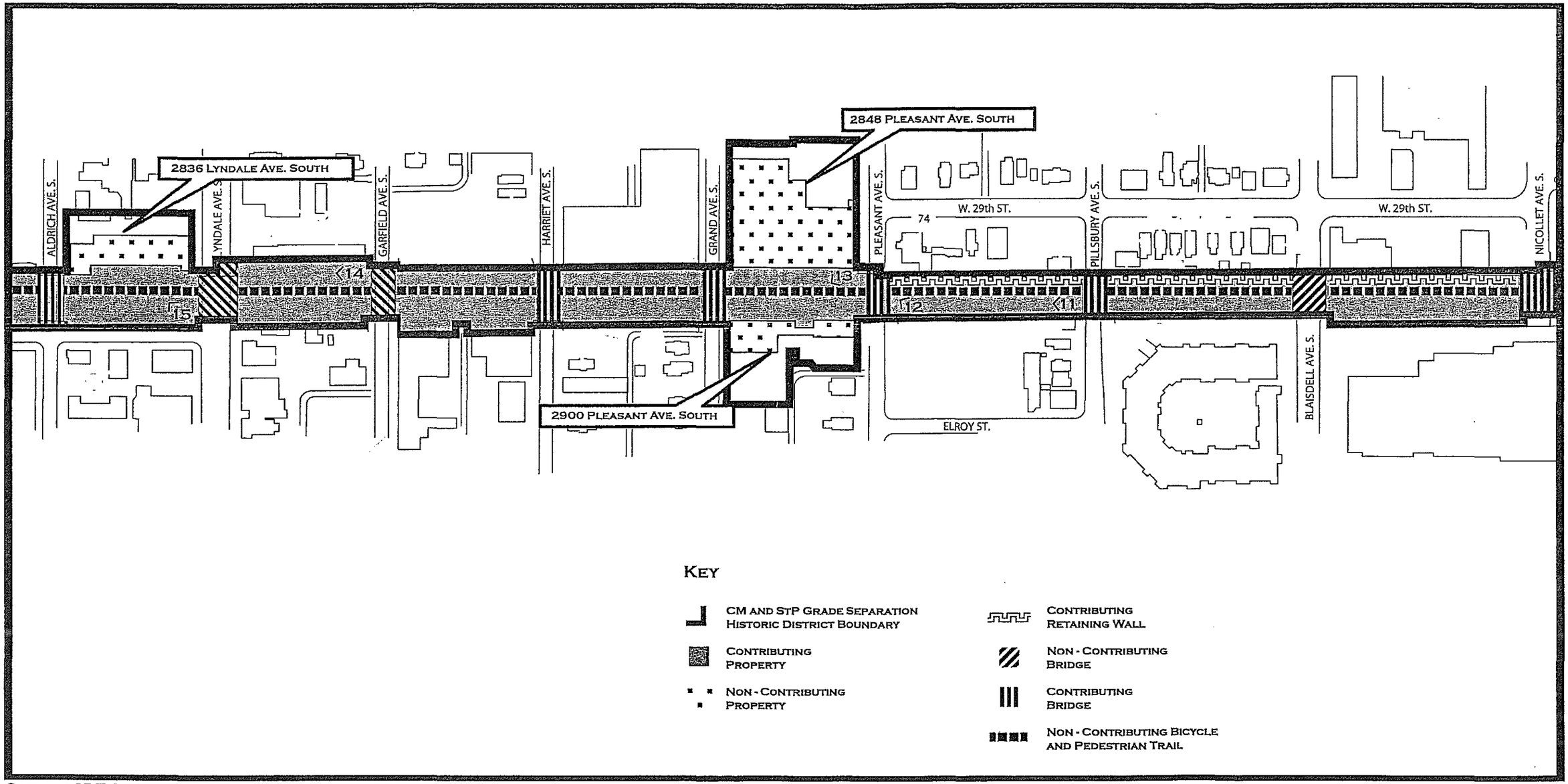


Source: SRF Consulting Group, Inc. and The 106 Group Ltd.

District Boundary, Photo Key and Sketch Map, 2004

CM and StP Grade Separation Historic District, Hennepin County, Minnesota



Source: SRF Consulting Group, Inc. and The 106 Group Ltd.

District Boundary, Photo Key and Sketch Map, 2004

CM and StP Grade Separation Historic District, Hennepin County, Minnesota

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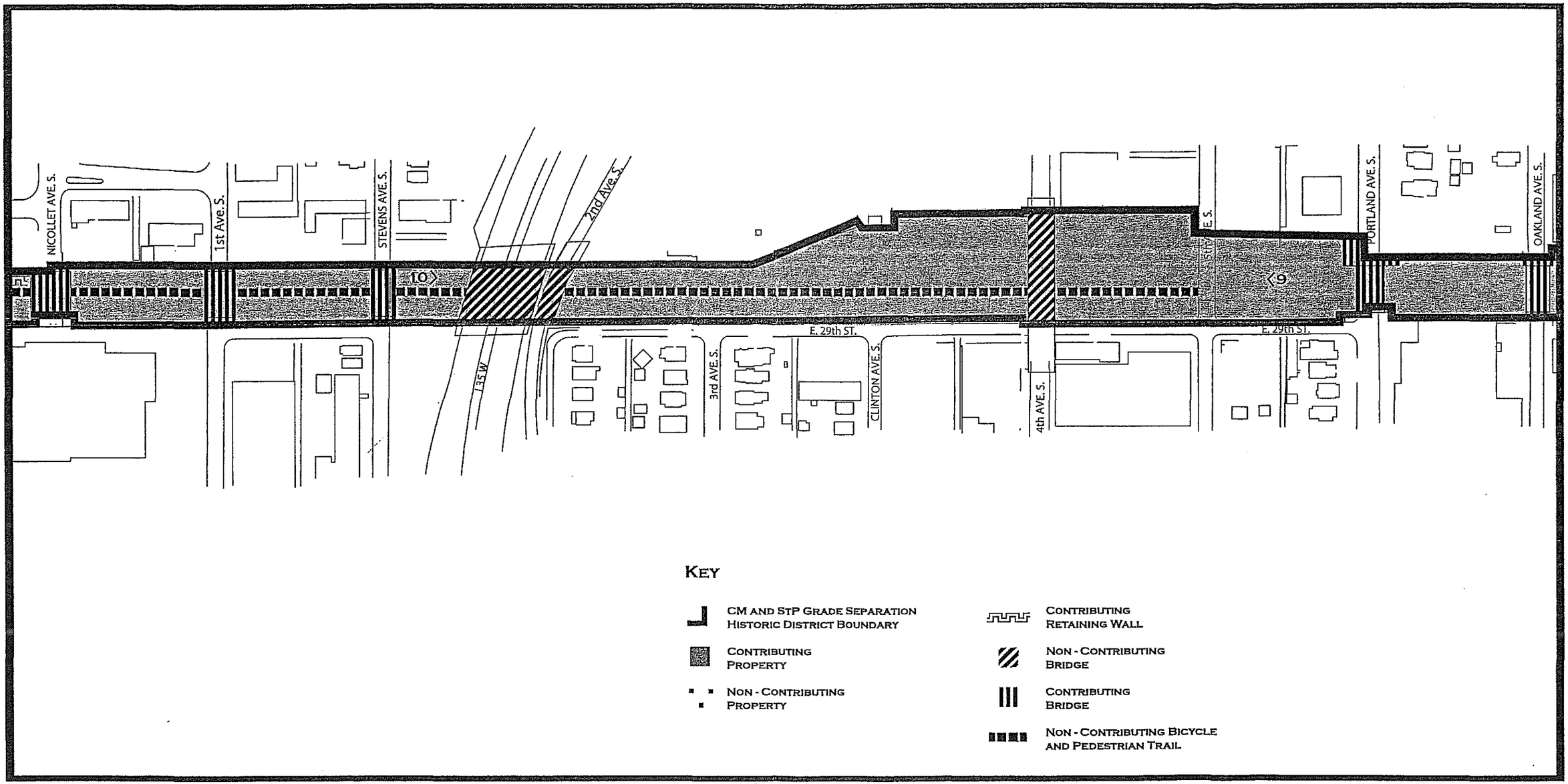
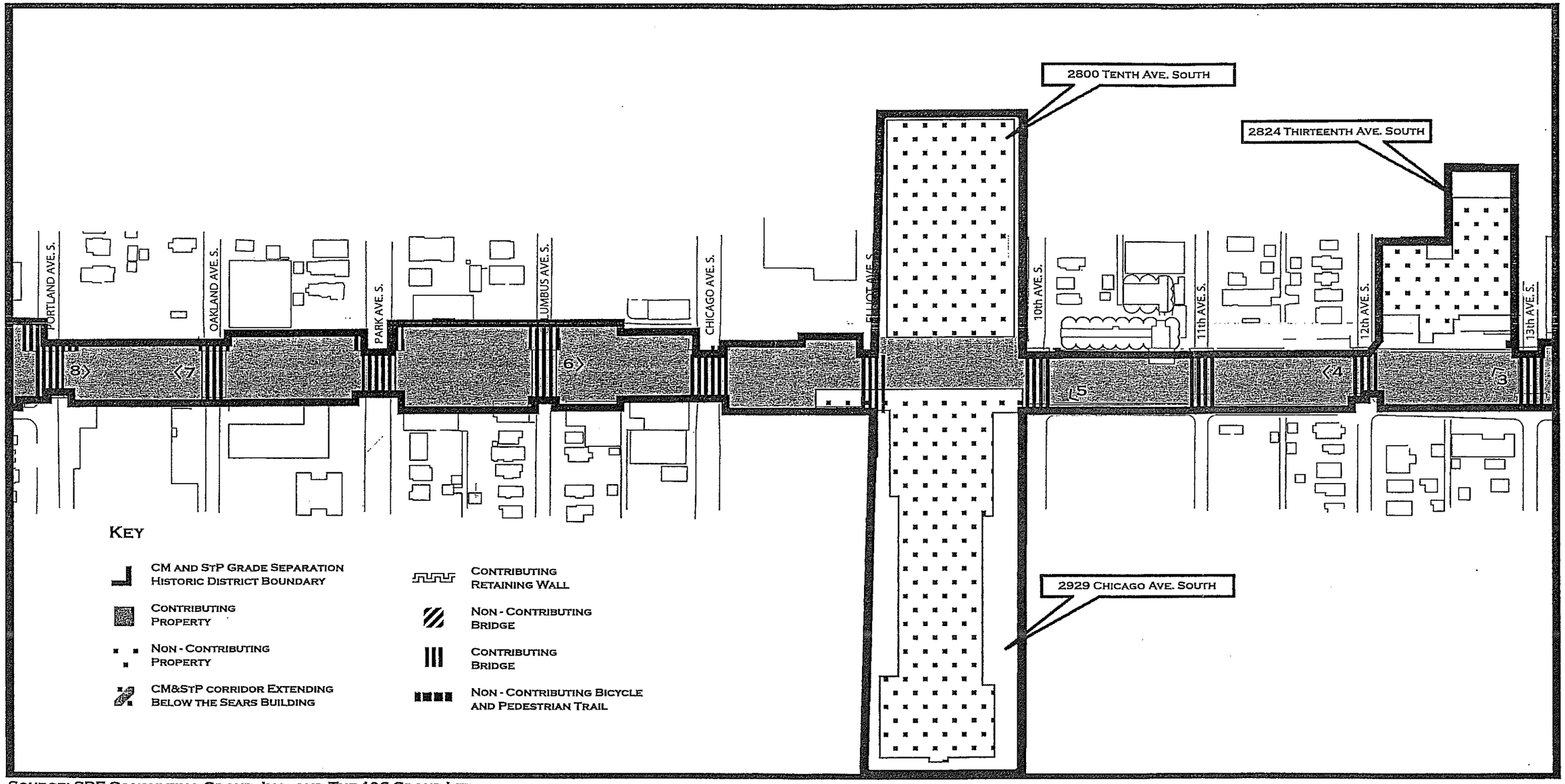


SOURCE: SRF CONSULTING GROUP, INC. AND THE 106 GROUP LTD.

DISTRICT BOUNDARY, PHOTO KEY AND SKETCH MAP, 2004

CM AND STP GRADE SEPARATION HISTORIC DISTRICT,
HENNEPIN COUNTY, MINNESOTA



Source: SRF Consulting Group, Inc. and The 106 Group Ltd.

District Boundary, Photo Key and Sketch Map, 2004

CM and StP Grade Separation Historic District, Hennepin County, Minnesota

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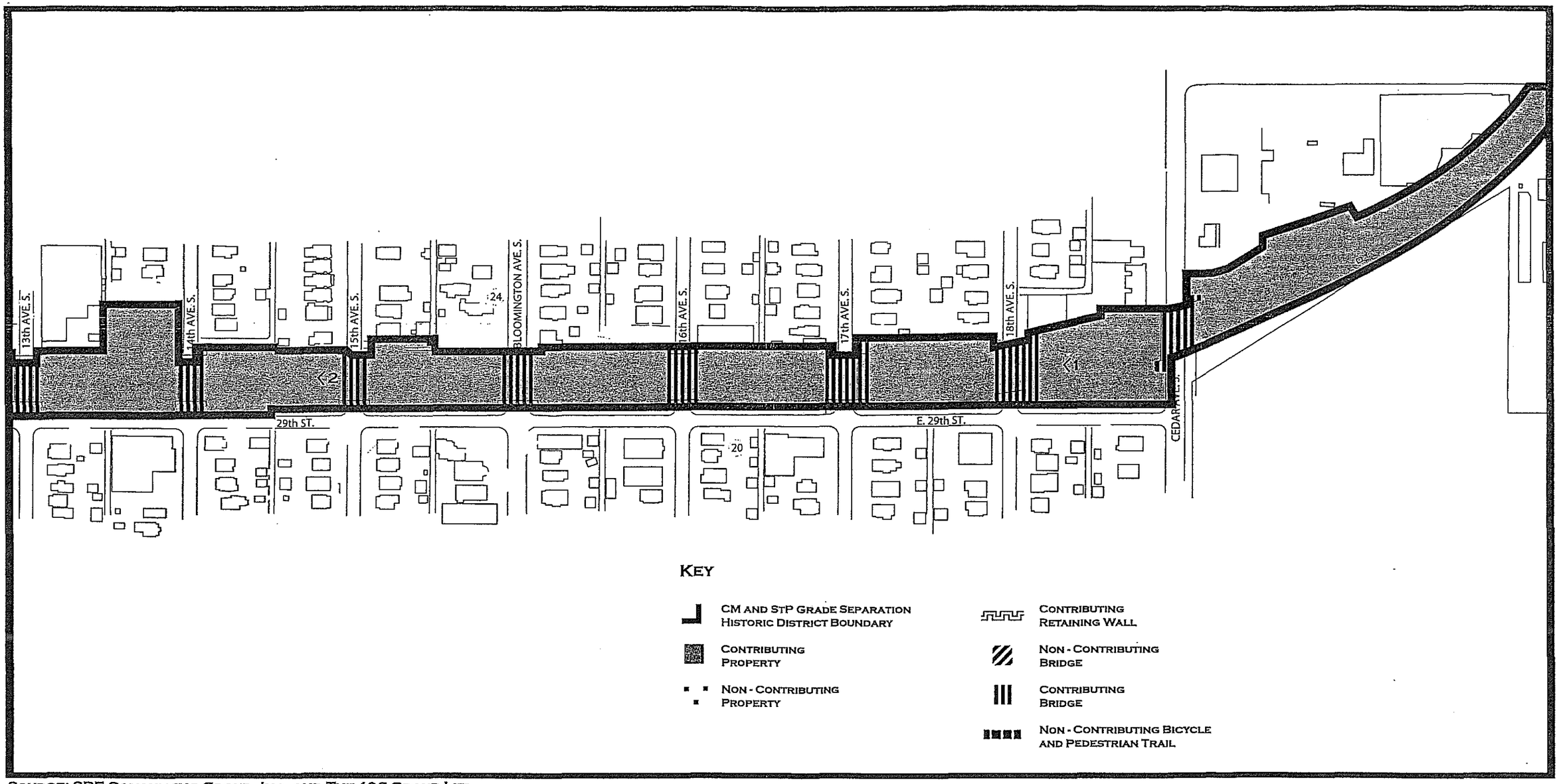

SOURCE: SRF CONSULTING GROUP, INC. AND THE 106 GROUP LTD.

DISTRICT BOUNDARY, PHOTO KEY AND SKETCH MAP, 2004

CM AND STP GRADE SEPARATION HISTORIC DISTRICT,
HENNEPIN COUNTY, MINNESOTA

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Appendix C. Reassessment of Number of Resources within Property: Additional Details

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Reassessment of Number of Resources Within Property: Additional Details (2016)

Resource	Classification	Location	Block	Construction date**	Included in Nomination	C/NC
Structures						
Grade separation trench	Structure	Length of corridor	1-43	1912-1916	Yes	C
Trail and retaining wall	Structure	Length of corridor; elevated from Humboldt to Stevens	2-19	1999-2005	Yes	NC
29th Street	Structure	Between 10th and Cedar Avenues	32-41	1912-1916	No	C
Bridge 27599	Structure	At Hennepin	2/3	1980, 2000	Yes	NC
Pedestrian bridge	Structure	At Girard	3/4	c.2004	No	NC
Bridge L8901	Structure	At Fremont	4/5	1913	Yes	C
Bridge 27665	Structure	At Emerson	5/6	1986	Yes	NC
Bridge 27666	Structure	At Dupont	6/7	1987	Yes	NC
Bridge L5893	Structure	West 29th Street over RR spur	7	1913	No	C
Bridge L8902	Structure	At Colfax	7/8	1913	Yes	C
Bridge L8903	Structure	At Bryant	8/9	1913	Yes	C
Bridge L8904	Structure	At Aldrich	9/10	1913	Yes	C
Bridge 27243	Structure	At Lyndale	10/11	1987	Yes	NC
Bridge 27675	Structure	At Garfield	11/12	1992	Yes	NC
Bridge L8906	Structure	At Harriet	12/13	1914	Yes	C
Bridge L8907	Structure	At Grand	13/14	1914	Yes	C
Bridge L8908	Structure	At Pleasant	14/15	1913	Yes	C
Bridge L8909	Structure	At Pillsbury	15/16	1914	Yes	C
Bridge 27610	Structure	At Blaisdell	16/17	1982	Yes	NC
Bridge 90590	Structure	At Nicollet	17/18	1914	Yes	C
Bridge 92347	Structure	At 1st	18/19	1914	Yes	C
Bridge L8910	Structure	At Stevens	19/20	1914	Yes	C
Bridge 27867	Structure	At I-35W	20	1967	Yes	NC
Bridge 27648	Structure	At 2nd	20/21	1982	Yes	NC
Abutment (former bridge)	Structure	At 3rd	21/22	1914	No	NC
Abutment (former bridge)	Structure	At Clinton	22/23	1915	No	NC
Bridge 27A32	Structure	At 4th	23/24	1997	Yes	NC
Bridge 90494	Structure	At Portland	25/26	1914	Yes	C
Bridge L8911	Structure	At Oakland	26/27	1915	Yes	C
Bridge 27B19	Structure	At Park	27/28	2006	No	NC
Bridge L8913	Structure	At Columbus	28/29	1915	Yes	C
Bridge 27A94	Structure	At Chicago	29/30	2005	No	NC

Reassessment of Number of Resources Within Property: Additional Details (2016)

Resource	Classification	Location	Block	Construction date**	Included in Nomination	C/NC
Bridge L8914	Structure	At Elliot	30/31	1915	Yes	C
Pedestrian bridge	Structure	East of Elliot	31	c.2004	No	NC
Bridge L8915 with added wingwall*	Structure	At 10th	31/32	1915/c 2007	Yes	NC
Bridge L8916 with added wingwall*	Structure	At 11th	32/33	1915/c.2007	Yes	NC
Bridge L8917	Structure	At 12th	33/34	1915	Yes	C
Bridge L8918	Structure	At 13th	34/35	1915	Yes	C
Bridge L8919	Structure	At 14th	35/36	1916	Yes	C
Bridge L8920	Structure	At 15th	36/37	1916	Yes	C
Bridge 92350	Structure	At Bloomington	37/38	1916	Yes	C
Bridge L8921	Structure	At 16th	38/39	1916	Yes	C
Bridge L8922	Structure	At 17th	39/40	1916	Yes	C
Bridge L8923	Structure	At 18th	40/41	1916	Yes	C
Bridge 90437	Structure	At Cedar	41/42	1915/1916	Yes	C
Ramp	Structure	Between Hennepin and Fremont	3	c.2004	No	NC
Ramp	Structure	Between Colfax and Bryant	8	1999	No	NC
Ramp	Structure	Between Bryant and Aldrich	9	1999	No	NC
Ramp	Structure	Between Blaisdell and Nicollet	17	1999	No	NC
Ramp	Structure	Between Oakland and Park	27	c.2004	No	NC
Ramp	Structure	Between 13th Ave to east of 14th Ave	35-36	c.2004	No	NC
Ramp	Structure	Between 17th and 18th	40	c.2004	No	NC
Staircase	Structure	Northwest corner of Bridge L8917	33	2012	No	NC
Terrace	Structure	At Emerson	6	2015	No	NC
Terrace	Structure	At Lyndale	11	c.2007	No	NC
Terrace	Structure	At Chicago	30	c.2005	No	NC

Reassessment of Number of Resources Within Property: Additional Details (2016)

Resource	Classification	Location	Block	Construction date**	Included in Nomination	C/NC
Sites						
Former rail yard (altered)	Site	Between 3rd and Fifth Avenues	22-25	c.2004	No	NC
Buildings - *These buildings either share or comprise trench wall or are located within the district's boundary*						
Bus station	Building	1324 Lagoon Avenue S	3	2000	No	NC
Breur Bros. Lumber Company	Building	2836 Lyndale Avenue S	10	1921	Yes	NC
Industrial building	Building	2845 Harriet Avenue S	13	1927/1990	No	NC
Western Alloyed Steel Casting Company Building	Building	2848 Pleasant Avenue S	14	1916	Yes	NC
Eighth Ward Warehouse	Building	2900 Pleasant Avenue S	14	1919 and 1927	Yes	NC
Zinsmaster Baking Building	Building	2900 Park Avenue S	27	1929	No	NC
Industrial building	Building	2854 Columbus Avenue S	28	1951	No	NC
Sears, Roebuck and Company Building	Building	2929 Chicago Avenue S	31	1928, 1929	Yes	NC
Sears, Roebuck and Company Building Addition	Building	2800 10th Avenue S	31	1978	Yes	NC
Dayton Rogers Manufacturing Company	Building	2824 13th Avenue S	34	1937; 1940-1947	Yes	NC
Apartments	Building	2850 Cedar Avenue S	41	2005	No	NC

* Bridges altered since Nomination, now non-contributing.

** Circa dates are utilized when a specific construction date/year was unable to be determined

Columns are explained as follows:

- Included in Nomination – Resource counted in the property table within the 2005 CM&StP Railroad Grade Separation Historic District Nomination.
- C/NC – status as recommended by Mead & Hunt based on reassessment.

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Appendix D. 2016 Correspondence between the Minnesota Department of Transportation and the State Historic Preservation Office

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Minnesota Department of Transportation

Office of Environmental Stewardship
Mail Stop 620
395 John Ireland Boulevard, St. Paul, MN 55155-1899

Office Tel: (651) 366-3633
Fax: (651) 366-3603

February 19, 2016

Ms. Sarah Beimers, Government Programs & Compliance
State Historic Preservation Office Minnesota
345 Kellogg Blvd. W., St. Paul, MN 55101

Subject: Local Historic Bridge Study Phase III – CM&StP Grade Separation Historic District reevaluation

Dear Ms. Beimers:

We are conducting the above-referenced study pursuant to our FHWA-delegated responsibilities for compliance with Section 106 of the National Historic Preservation Act, as amended (36 CFR 800), and as per the terms of the 2005 Section 106 Programmatic Agreement (PA) between the FHWA and the Minnesota State Historic Preservation Office (SHPO) and the 2008 FHWA-SHPO Historic Bridge PA.

Enclosed please find the draft Chicago, Milwaukee and St. Paul Grade Separation Historic District (CM&StP Historic District) reevaluation report prepared by Mead & Hunt, Inc., prepared as part of the Local Historic Bridge Study: Phase III. The 2.8-mile CM&StP Historic District was listed in the National Register of Historic Places in 2005.

During the completion of the management plans for the district's bridges last year, our historical consultant noted that extensive new development has occurred within and directly adjacent to the district, resulting in compromised historic integrity. Our interest in reevaluating the district's integrity stems from our role administering Section 106 reviews for FHWA funded projects. Once aware of the changes in the district, we wanted to reevaluate its integrity as per 36 CFR 800.(c)(1) ("The passage of time, changing perceptions of significance, or incomplete prior evaluations may require the agency official to reevaluate properties previously determined eligible or ineligible") prior to any additional City, County, MnDOT or HRCCA projects to ensure the district still has sufficient integrity to convey its significance and that protection under Section 106 and Section 4(f) is still warranted.

The reevaluation of the CM&StP Historic District focused on the district's historic integrity, which is defined as "the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's prehistoric or historic period." In order to identify alterations, historians reviewed the National Register Nomination, previous studies, and historic documents, including photographs, articles, and maps. A discussion of the district is presented as it has appeared over time from the period of significance to the present day. The reevaluation also includes an updated resource count based on NPS guidelines and an analysis of the district's present historic integrity. The report concludes with findings based on the reevaluation.

Please provide any comments within 30 days of receipt of the reevaluation report in order to continue with next steps and to meet project deadlines. Thank you in advance for your participation in this study. We look forward to working with your office on the completion of this phase of the local historic bridge project.

Sincerely,

Kristen Zchomler

Kristen Zchomler, Historian and CRU Supervisor
Cultural Resources Unit

Enclosure

cc: Phil Forst, FHWA
Emeka Ezekwemba, FHWA
Patti Loken, State Aid
Joe Litman, LHB
Amy Squitieri, Mead & Hunt
Linda Pate, USACE
Renee Barnes, MnDOT CRU
Dave Conkel, State Aid

Minnesota
Historical Society
MINNESOTA HISTORIC PRESERVATION OFFICE

Using the Power of History to Transform Lives
PRESERVING › SHARING › CONNECTING

May 5, 2016

Ms. Kristen Zschomler
MnDOT Cultural Resources Unit
Office of Environmental Stewardship
MN Dept of Transportation, MS 620
395 John Ireland Blvd
St. Paul, MN 55155-1899

RE: Local Historic Bridge Study Phase III – CM&StP Grade Separation Historic District Reevaluation
Minneapolis, Hennepin County
SHPO Number: 2016-1726

Dear Ms. Zschomler:

Thank you for the opportunity to comment on the above project. Information received on 22 February 2016 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800, and also per the terms of the 2005 Programmatic Agreement (PA) between the Federal Highway Administration (FHWA) and the Minnesota State Historic Preservation Office (SHPO) and the 2008 FHWA-SHPO Historic Bridge PA.

The Minnesota Historic Preservation Office's National Register Historian Denis Gardner and National Register Architectural Historian Ginny Way have completed a review of the draft report entitled *Midtown Greenway Reevaluation, Local Historic Bridge Study – Phase 3*, dated February 2016, which was prepared for your agency by Mead & Hunt. Their comments on this draft report are provided below:

> The Minnesota Historic Preservation Office (MnHPO) has reviewed the reevaluation study for the National Register-listed Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District (District) in Minneapolis, a property commonly known as the Midtown Greenway. The study informs us that the Minnesota Department of Transportation (MnDOT) initiated the report because of the agency's Section 106 and 4(f) responsibilities within the District.
>
> The documentation focuses on the District's historic integrity. The authors reviewed the District's nomination, which was completed in 2005, as well as additional studies addressing certain aspects of the District. The authors explain that the study is a "discussion of the district as it has appeared over time from completion to the present day" and "the reevaluation . . . presents an updated resource count based on NPS guidelines and an analysis of the district's present historic integrity."
>
> The above suggests that the study is largely a "status report," which also is our sense after reading the documentation. It is helpful information, providing a sense of the District's appearance today. However, we were surprised that the study reached no formal conclusion on whether or not the

District still qualifies for listing in the National Register. Our office believes that it does, but if a study were pursued to answer this question we would need to address the reasons for why a property can be removed from the National Register, guidance found at 36 CFR 60.15 (a) (1) through (4):

(1) The property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination and prior to listing.

(2) Additional information shows that the property does not meet the National Register criteria for evaluation.

(3) Error in professional judgment as to whether the property meets the criteria for evaluation.

(4) Prejudicial procedural error in the nomination or listing process.

Information presented on Page 44 of the reevaluation study briefly highlights these reasons. However, speaking to (3) and (4) first, the MnHPO does not believe that there was a procedural error or an error in judgment that led to listing of the District. Presumably (1) and/or (2) may be the impetus for the reevaluation study, although we do not know what new information may have come to light (2); the reevaluation study has not presented anything surprising in this regard.

Part 60.15 (a) (1) is a two part stipulation: either property changes that have taken place since the property was listed now obligate the property's delisting from the National Register **or** the property was nominated but lost its qualifying characteristics before official listing.

There is no indication that the property has lost its character-defining qualities between nomination and official listing, and from our perspective the property cannot presently be delisted because of changes since the time of nomination, as alterations during this period have largely been outside of the boundaries of the property.[1] In fact, the present reevaluation study states as much on Page 19: "Since 2005 [NR listing date] the majority of the changes have occurred adjacent to the boundary [of the district]." While these changes impact the character of the setting, we do not believe that these changes alone warrant the District's delisting today.

When surveying the District as part of this reevaluation study, those conducting the reevaluation study broke the District into segments, drawing a conclusion regarding the integrity of each. Although we reviewed the District similarly, the findings of our office are very different than that presented in the reevaluation report. Indeed, nine segments which the study found non-contributing, our office concluded are actually contributing to the District. This disparity is explained by the differing presuppositions of the parties surveying the District. Our office viewed the corridor through the prism of 60.15 (a) (1)—alterations to the district since listing—whereas the reevaluation contemplated changes to District resources made prior to the District's nomination. This is curious since such a task would have been a part of the original nominating process, something already contemplated before the corridor was officially listed in the National Register in 2005.

[1] A summary of alterations prior to the district's listing is on page 5 of the reevaluation study.

One of the studies referenced in the reevaluation documentation is the 2007 "Midtown Corridor Historic Bridge Study," a report that implies on page 81 that the District is fast-losing historic integrity. However, this report also emphasizes characteristics that were absent at the time of listing (the trackage, for example) and speculates about what may be lost in the future (namely, bridges). Based on 60.15 (a) (1), changes made prior to nomination or proposed to be made in the future do not presently justify delisting the District.

In 2005, plainly, several parties believed the District should be listed. The Memorandum of Agreement that brought about the National Register nomination was signed by the Soo Line Railroad Company, Hennepin County Regional Rail Authority, and the MnHPO. Moreover, the property's nomination was unanimously passed by the Minnesota State Review Board, with board member Katherine Solomonson commenting that: "it was a fantastic nomination on a crucial area for development."[2] Finally, the Keeper's Office in Washington, D.C. agreed that the property belonged in the National Register.

While the reevaluation report suggests that the historic integrity of the District is lacking and that perhaps the District should not be in the National Register, we find some of the analysis mistaken. For instance, the study concludes on implied equivalency, whereby contributing/non-contributing components are parceled into percentages. It indicates that only 40 percent of the components composing the District are contributing, implying that 60 percent are not, and that the District could be considered ineligible because less than 50 percent of the components are contributing. There is no percentage requirement for contributing resources in a historic district property type. More concerning in this analysis, however, is that it implies that the non-contributing modern bike ramp is equivalent to the historic trench or that a modern staircase is equivalent to a historic bridge. Ultimately, the District is historically significant as a substantial grade separation. Given the contributing resources from the original nomination remaining today, the District still "feels" like a substantial grade separation.

Another potential challenge to removing the District from the National Register is the broader context within which the property may be viewed. The minutes from the State Review Board meeting of March 22, 2005 reveal that the brief period of significance that was chosen (1912-1916) came about in part because of limited time and resources at the time of nomination. The minutes note that "it was decided to focus on the property's significance that centered on the decisions made among various groups within the city that resulted in the construction of the grade separation." It is possible the District could have a longer period of significance, assuming that the research justifying this is completed in the future. This would likely identify additional contributing resources to the District.

The Midtown Greenway is a popular Minneapolis resource, and one experiencing development pressures that are raising historic integrity concerns, especially regarding the integrity of setting. However, at present, following the guidance of 36 CFR 60.15, we do not believe that the Chicago,

[2]Minnesota State Review Board, "Minutes," March 22, 2005, available at Minnesota Heritage Preservation Department, Minnesota Historical Society, St. Paul.

Milwaukee and St. Paul Railroad Grade Separation Historic District should be removed from the National Register.

Please feel free to contact me if you wish to arrange for a meeting with MnHPO Review & Compliance and National Register staff in order to discuss comments and recommendations presented in this letter. I can be reached at 651-259-3456 or sarah.beimers@mnhs.org.

Sincerely,

Sarah J. Beimers

Sarah J. Beimers, Manager
Government Programs & Compliance

cc: Denis Gardner and Ginny Way, MnHPO

MINNESOTA HISTORICAL SOCIETY

Heritage Preservation Department Memorandum

Date: 21 September 2016

To: Sarah Beimers, Manager, Government Programs & Compliance

From: Denis Gardner, National Register Historian
Ginny Way, National Register Architectural Historian

RE: MnDOT Re-Evaluation of the NRHP-listed Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District, Minneapolis, Hennepin County.

In early 2016,the Minnesota Historic Preservation Office (MnHPO) reviewed a draft report of a re-evaluation study entitled *Midtown Greenway Reevaluation: Local Historic Bridge Study – Phase 3* (Mead & Hunt, February 2016) for the National Register-listed Chicago, Milwaukee and St. Paul Railroad Grade Separation in Minneapolis (Historic District), a property commonly known as the Midtown Greenway. The study was initiated by the Minnesota Department of Transportation (MnDOT). The study chiefly focused on the historic integrity of the Historic District, although the draft report did not offer a formal conclusion regarding the integrity. After reviewing the draft report, the MnHPO concluded that the Historic District retained sufficient integrity to remain listed in the National Register. The MnHPO's conclusion, based upon the Federal preservation program regulations, and comments pertaining to the study were provided in a letter dated 5 May 2016 from Manager of Government Programs & Compliance Sarah Beimers to Kristen Zschomler, MnDOT Cultural Resources Unit Supervisor. On 9 June 2016, MnHPO staff, MnDOT-CRU staff, and consultants participated in a meeting to discuss the draft report and MnHPO comments.

Taking MnHPO comments into account, the MnDOT subsequently initiated a revision to the re-evaluation study on the Historic District to be included in a second draft report which will be delivered to the MnHPO at a future date. Ostensibly, this subsequent report will assert that the Historic District may have been listed in the National Register misguidedly, asserting that those parties responsible for the listing at the time erred in their professional judgment. Grounds for this assertion are rooted in the National Register Federal Program Regulations at 36 CFR 60.15 (a) (3), which states: "Error in professional judgment as to whether the property meets the criteria for evaluation." This creates some confusion, however, for this section of the CFR specifically speaks to "criteria" for evaluation. Discussion to this point has focused on historic integrity, not criteria employed for listing the Historic District (Criterion A, Community Planning and Development). Are we now asserting that the Historic District does not meet historic significance under Criterion A, or is it the belief that the Historic District would not be eligible under Criterion A without first retaining sufficient historic integrity? This should be clarified in the upcoming revised report.

It is apparent that the survey methodology of the study's authors of the first draft report differed from that of the MnHPO. The MnHPO National Register staff undertook its own field survey of the Historic District on 9 September 2015.Therefore MnDOT requested that the MnHPO explain the standards it used during this survey to reach conclusions regarding the historic integrity of the Historic District. MnDOT has determined that this information will be incorporated into the second draft report.

When surveying the Historic District, which is a linear historic district, the MnHPO parceled the property by segments, reviewing each segment individually and drawing a conclusion as to whether or not a particular segment contributed or did not contribute to the Historic District. The MnHPO was guided by its understanding of historic integrity, which is defined as "the ability of a property to convey its historic significance." Put another way, every property has character-defining features, features that tell us what it is supposed to be, what it is supposed to represent, features that reflect why it is supposed to be historically significant. This is true of garishly fantastic properties and it is true of remarkably humble properties. The National Park Service addresses this concept in National Register Bulletin 15, page 46, "Defining the Essential Physical Features." The bulletin states: **All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity** [emphasis added]. Additionally, National Register Bulletin 15 explains that "the evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance."

Historic integrity is composed of seven aspects: location, design, setting, materials, workmanship, feeling, and association. Each integrity aspect informs us of what we must consider when contemplating a property's integrity. The aspects of integrity help clarify our thinking, which allows us to make judgments. Depending on the property, not all of the integrity aspects will carry the same influence.

When evaluating this Historic District, in particular, we need know why the property is listed in the National Register, why it is historically significant, what it is supposed to be. The nomination explains that the property is historically significant because it is a substantial grade separation that improved the safety and aesthetics of a large portion of south Minneapolis at the time in the early 20th century when the city was rapidly expanding and becoming urbanized. Standing in the Historic District today it still feels like a substantial grade separation, and we feel this because the "defining essential physical features" are the sub-grade trench itself and the even succession of at-grade bridges that span the trench. In other words, these components compose the centerpiece of the property.

Thus far the discussion has been primarily on the loss of integrity to the setting of the Historic District. We would argue that, while important, the setting is not the aspect of integrity most paramount to understanding the significance of the district as a whole. The significance of the Historic District is the clear separation of uses. This separation of uses would not have been necessary if the area around the rail line was not becoming more built up and congested. While the contemporary construction does not recall the early twentieth century it continues to be characteristically "urban" and illustrates the use of the land around the rail line that required the construction of the trench in first place. There are places where the change in setting is more apparent than others and each segment should be examined to determine the impact all non-historic construction and then considered comprehensively in regards to the Historic District's overall integrity.

We further approached survey of the Historic District with the understanding that we are bound by 36 CFR 60.15 (a) (1). This section of the CFR states: "The property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination and prior to listing." In essence, we are asked what has changed since the property was listed in 2005? It is important to understand that discussion of what had changed with the property after its period of significance and prior to 2005 is not the standard we must employ. As with all National Register-listed properties, such considerations would

have been part of the original listing process—they would have been part of the discussion before the property was listed in 2005.

Keeping the above in mind, it does not seem surprising that the MnHPO and the MnDOT disagree on historic integrity with some segments of the Historic District. The following pages highlight the nine segments with which the views of the MnHPO and the MnDOT differ. The photographs depict the linear district from east to west

Segment No. 40 (Between 18th and 17th Ave. S.)

Photo 1: looking west

Photo 2: looking northwest at ramp.

Photo 3: looking east. Ramp at left.

Photo 4: looking southeast. South elevation of trench.

Segment 40 Comments: the principal features of this segment of the district remain, including the trench and the two historic bridges that define its east and west boundary. The MnDOT may have concluded that this segment is non-contributing because a bike ramp exists in the trench. However, the historical record notes that bike ramps, the bike/walking trail, non-original retaining walls, and light standards were in place within the trench at the time the Historic District was listed in the National

Register in 2005. Given this information, it is unclear why this segment was determined non-contributing.

Segment No. 33 (Between 12th and 11th Ave. S.)

Photo 5: looking west.

Photo 6: looking southwest at south elevation of trench.

Photo 7: looking northwest. Stairway at right.

Photo 8: looking south. Access to below ground tunnel.

Photo 9: looking east.

Photo 10: looking northeast at north elevation of trench.

Photo 11: looking northeast at stairway.

Segment 33 Comments: the principal character-defining features of the segment are apparent, the trench and the bridges that define the east and west boundary of the segment. A section of non-original retaining wall is at the south side of the trench, although the historical record explains that many of these structure-types were in place at the time of listing. Perhaps the MnDOT concluded that the segment was non-contributing because a stairway is located in the northeast corner of the segment. However, when viewing the segment as a whole, the intrusiveness of the stairway is relatively minor.

Segment 30 (Between Elliot and Chicago Avenues)

Photo 12: looking west.

Photo 13: looking southwest at south side of trench.

Photo 14: looking northwest at north side of trench.

Photo 15: looking east.

Photo 16: looking southeast at south side of trench.

*Photo 17 same as Photo 16

Photo 18: looking northeast at north side of trench.

Segment 30 comments: the trench and the original bridge marking the east boundary remain. A post-2005 bridge carries Chicago Avenue over the trench at the west boundary of the segment. At the time this Chicago Avenue replacement bridge was reviewed by the MnHPO, it was determined that the new bridge had been designed in conformance with the Secretary of the Interior's Standards for Rehabilitation, a conclusion that indicates the new bridge was compatible with the Historic District and protected the historic integrity of the property. The retaining wall at the north likely was in place at the time of listing. Documentation regarding construction at the south side of the trench does not note that it is new. Installation of a new bridge at Chicago Avenue does not make the entire segment non-contributing.

Segment No. 27 (Between Park and Oakland Avenues)

Photo 19: looking west.

Photo 20: looking southwest at south side of trench.

Photo 21: looking northwest at ramp north side of trench.

Photo 22: looking east.

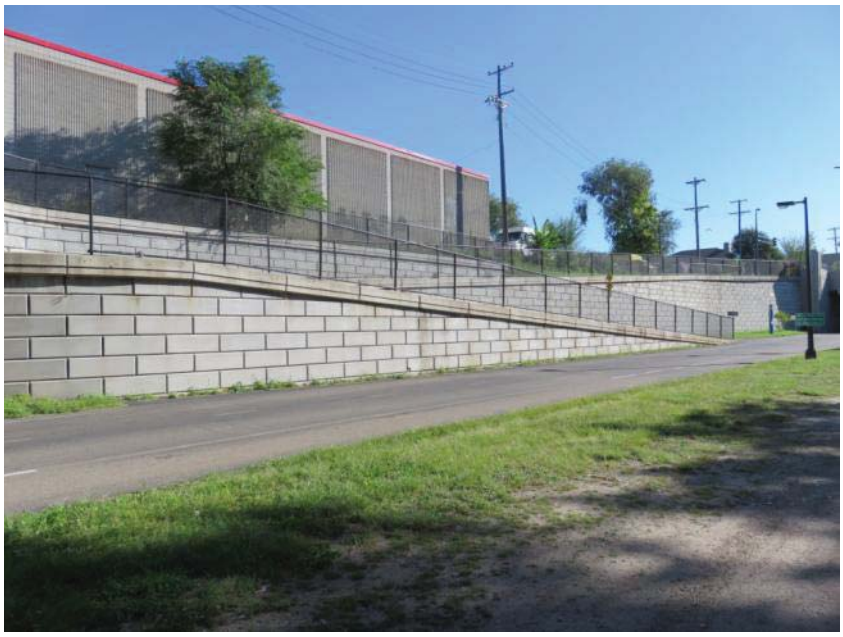

Photo 23: looking northeast at ramp.

Photo 24: looking southeast at south side of trench.

Segment 27 Comments: the trench and the original bridge marking the west boundary of the segment remain. A post 2005 bridge marks the east boundary of the segment. A bike ramp is at the north side of the trench. The bike ramp likely existed at time of listing. The post 2005 bridge by itself is not enough to offset the other contributing aspects of the segment. At the time this Park Avenue replacement bridge was reviewed by the MnHPO, it was determined that the new bridge had been designed in conformance

with the Secretary of the Interior's Standards for Rehabilitation, a conclusion that indicates the new bridge was compatible with the Historic District and protected the historic integrity of the property.

Segment No. 17 (Between Nicollet and Blaisdell Avenues)

Photo 25: looking west.

Photo 26: looking southwest at south side of trench.

Photo 27: looking northwest at ramp at north side of trench.

Photo 28: looking east.

Photo 29: looking southeast at south side of trench.

Photo 30: looking northeast at ramp north side of trench.

Segment 17 Comments: the trench remains, as does the original bridge defining the east end of the segment. A non-contributing bridge defines the west end of the segment. A bike ramp is at the north side of the trench, while a metal, chain-link fence runs through the middle of the segment. The ramp was likely in place at the time the property was listed, as was the chain-link fence. The bridge predates 2005. It is unclear why this segment was determined non-contributing.

Segment No. 16 (Between Blaisdell and Pillsbury Avenues)

Photo 31: looking west.

Photo 32: looking southwest at south side of trench.

Photo 33: looking northwest at north side of trench.

Photo 34: looking north at north side of trench.

Photo 35: looking east.

Photo 36: looking southeast at south side of trench.

Photo 37: looking northeast at north side of trench.

Photo 38: looking north at north side of trench.

Segment 16 Comments: the trench remains, as does the original bridge defining the west side of the segment. A non-original bridge marks the east boundary. A metal, chain-link fence runs through the middle of the segment. The non-original bridge was in place prior to listing, as was the chain-link fence. It is unclear why this segment was determined non-contributing.

Segment No. 10 (Between Lyndale and Aldrich Avenues)

Photo 39: looking west.

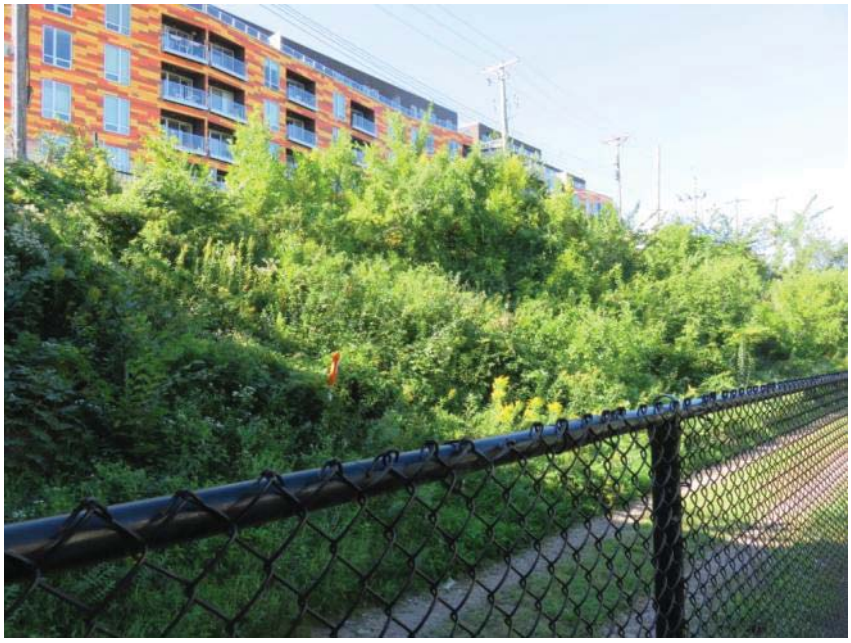

Photo 40: looking southwest at south side of trench and residential units.

Photo 41: looking northwest at north side of trench and commercial building?

Photo 42: looking east.

Photo 43: looking southeast at south side of trench. Residential units in background.

Photo 44: looking northeast at east side of trench and commercial structures/buildings?

Segment 10 Comments: the trench remains, as does the original bridge marking the west boundary of the segment. Non-contributing construction is at the north side of the trench. Residential construction is beyond the property boundary near the south side of the trench. The non-contributing construction to the north predates 2005. The non-contributing construction to the south of the trench is outside of the property boundary but nevertheless influences integrity of setting. While setting is undermined by this construction, troubling setting alone does not perfunctorily make the segment non-contributing.

Segment No. 9 (Between Aldrich and Bryant Avenues)

Photo 45: looking west.

Photo 46: looking southwest at south side of trench. Background is residential building?

Photo 47: looking northwest at north side of trench and residential units.

Photo 48: looking east.

Photo 49: looking southeast at south side of trench.

Photo 50: looking northeast at ramp and residential units at north side of trench.

Segment 9 Comments: the trench remains, as do the original bridges marking the east and west end of the segment. A bike ramp is at the north side of the trench and a chain-link fence runs through the segment. The ramp was likely in place at the time of listing, as was the chain-link fence. New residential construction is outside the property boundary near the north side of the trench. Like the previous segment, integrity of setting is compromised by this construction, but the troubling setting north of the boundary by itself does not warrant determining the entire segment non-contributing.

Segment No. 8 (Between Bryant and Colfax Avenues)

Photo 51: looking west.

Photo 52: looking southwest at west side of trench.

Photo 53: looking northwest at ramp and residential units north side of trench.

Photo 54: looking east.

Photo 55: looking southeast at south side of trench.

Photo 56: looking northeast at ramp and residential units north side of trench.

Segment 8 Comments: the trench remains, as do the original bridges that mark the east and west ends of the segment. A bike ramp is located at the north side of the trench and a chain-link fence runs through its middle. New residential construction borders the property boundary to the north. The ramp was likely in place at the time of listing, as was the chain-link fence. New residential construction is outside the Historic District boundary near the north side of the trench. Trees have been are planted

near the property line. Like the previous segment, integrity of setting is compromised by this new construction, and the addition of new foliage further unsettles integrity of setting. However, it is out of sorts to conclude that the setting failings at the north side of the boundary outweigh the principal character-defining features of the segment.

Segment No. 5 (Between Emerson and Freemont Avenues)

Photo 57: looking west.

Photo 58: looking southwest at south side of trench.

Photo 59: looking northwest at north side of trench and residential units.

Photo 60: looking east.

Photo 61: looking southeast at south side of trench.

Photo 62: looking northeast at north side of trench and residential units.

Segment 5 Comments: the trench remains, as does the original bridge marking the west end of the segment. A non-original bridge marks the east end of the segment. A chain-link fence runs through the trench's middle. New residential construction borders the property boundary to the north. The original trench wall at the north side appears to have been capped with new concrete. Trees have been planted at the north side of the trench. The non-original bridge was constructed prior to 2005. As with the

previously-noted segment, integrity of setting is compromised by the residential construction beyond the property boundary near the north side of the trench. Newly-planted trees just inside the boundary at this side negatively affect the segment. Nevertheless, concluding that these things supersede all else in the segment is not convincing.

There are instances where MnHPO concurred with MnDOT's non-contributing recommendations, specifically Segments 3, 4, 6, 7, 11, 12, 20-24, 31, and 32. MnHPO agrees that the integrity of these segments has been lost due to the cumulative changes within and above the trench. Below is further explanation as to why we found Segments 3 and 4, between Hennepin Ave and Freemont Ave, non-contributing.

Segment 3, between Girard Ave. S. and Hennepin Ave. S. no longer retains sufficient integrity to convey the significance of the Historic District as a whole. It is clear from National Register nomination Image 19 that the retaining wall on the south side of the trench and the Hennepin Ave bus shelters were extant at the time of listing. Based on the height from which the image is taken, and Mead & Hunt's research, we can also assume the pedestrian/bike bridge which carries Girard Ave S. over the bridge was extant as well. Since listing, this segment has seen further construction, a new ramp running its length on the north side and new construction on the southern edge. The pre-2005 construction does not contribute to the significance of the district and the new construction, coupled with existing conditions, leads us to determine this segment non-contributing.

Similarly **Segment 4** has lost sufficient integrity to convey the Historic District's significance. While the bridge at Fremont Ave. S. is historic, the retaining wall and pedestrian bridge are considered non-contributing resources. Setting, in this case, is drastically affected by the new construction on the northern edge of the Historic District. Here, the trench is shallower than in other segments and the new construction is therefore more intrusive. Coupled with the non-contributing retaining wall on the southern side and the non-contributing pedestrian bridge blocking the view to Hennepin Avenue S., this segment is considered non-contributing.

Summary Comments

It is imperative, for any National Register re-evaluation, that the Historic District be considered as a whole. The amount of change to character-defining features and spaces that can be accommodated within a historic district will vary according to the roles the features and spaces play in establishing the overall character of the property. It is generally our perspective that, like aspects of integrity, not all character-defining features and spaces carry equal weight. For this Historic District, as stated above, the linear constructed trench which separates the above at-grade urban environment from the sub-grade transportation corridor as well as the succession of bridge crossings, at mostly regular intervals and comprising of similar sized and styled crossing structures, are the most significant character-defining features of the district. Because of the size and continuity of these features, when considered together as one linear historic property, there is an allowance for many smaller intrusions and changes within the district. The MnHPO concurs that 13 of the 43 segments (see below) could be considered non-contributing; however, we remain unconvinced that the non-contributing status of these segments

renders the Chicago, Milwaukee and St. Paul Railroad Grade Separation Historic District ineligible for listing in the National Register.

Contributing/Non-Contributing Status, by segment, west to east

Undisputed Segments, Contributing (20):
1 and 2 – Humboldt Ave S. to Hennepin Ave S.
13 – Harriet Ave S. to Grand Ave S.
14 – Grand Ave S. to Pleasant Ave S.
15 – Pleasant Ave S. to Pillsbury Ave S.
18 – Nicollet Ave S. to 1st Ave S.
19 – 1st Ave S. to Stevens Ave S.
25 – 5th Ave S. to Portland Ave S.
26 – Portland Ave S to Oakdale Ave S.
28 – Park Ave S. to Columbus Ave S.
29 – Columbus Ave S to Chicago Ave S.
34 – 12th Ave S. to 13th Ave S.
35 – 13th Ave S. to 14th Ave S
36 – 14th Ave S. to 15th Ave S.
37 – 15th Ave S. to Bloomington Ave S.
38 – Bloomington Ave S. to 16th Ave S.
39 – 16th Ave S. to 17th Ave S.
41 – 18th Ave S to Cedar Ave S.
42 and 43 – Cedar Ave S. to the eastern boundary of the district

Undisputed Segments, Non-Contributing (14):
3 – Hennepin Ave S. to Girard Ave S.
4 – Girard Ave S. to Freemont Ave S.
6 – Emerson Ave S. to Dupont Ave S.
7 – Dupont Ave S. to Colfax Ave S.
11 – Lyndale Ave S. to Garfield Ave S.
12 – Garfield Ave S. to Harriet Ave S.
20 – Stevens Ave S. to 2nd Ave S
21 – 2nd Ave S. to 3rd Ave S
22 – 3rd Ave S to Clinton Ave S
23 – Clinton Ave S. to 4th Ave S.
24 – 4th Ave S to 5th Ave S.
31 – Elliot Ave S. to 10th Ave S.
32 – 10th Ave S. to 11th Ave S.
40 – 17th Ave S. to 18th Ave S.

Disputed Segments (9):

5 – Freemont Ave S. to Emerson Ave S.

8 – Colfax Ave S. to Bryant Ave S.

9 – Bryant Ave S. to Aldrich Ave S.

10 – Aldrich Ave S. to Lyndale Ave S.

16 – Pillsbury Ave S. to Blaisdell Ave S.

17 – Blaisdell Ave S. to Nicollet Ave S.

27 – Oakdale Ave S. to Park Ave S.

30 – Chicago Ave S to Elliot Ave S.

33 – 11th Ave S to 12th Ave S.

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Appendix E. Consideration of a Discontiguous District and Revision of the District's Boundary

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Discontiguous district

Mead & Hunt historians reviewed NPS guidelines related to a discontiguous district. As indicated in the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, a discontiguous district is allowed for historic districts only under certain circumstances. The most applicable circumstance presented in this bulletin states, "When a portion of a district has been separated by intervening development or highway construction and when the separated portion has sufficient significance and integrity to meet National Register criteria."

The CM&StP Historic District is bisected by I-35W at roughly its mid-point (block 20). If blocks with intervening development stemming from the construction of the highway are removed from consideration, a discontiguous district could be formed that is comprised of the following blocks:

- A 20-block section between Humboldt and Stevens Avenues (blocks 1-19; includes twelve interspersed blocks without integrity).

- A 19-block section between 5th Avenue and 28th Street (blocks 25-43; includes six interspersed blocks that lack integrity).

Under this option, blocks 20-24 would be removed from the National Register listing and would no longer be considered part of the listed historic district. Removal of the blocks surrounding I-35W has little effect on the overall integrity of the district. Eliminating the four blocks only improves the integrity by five percent, from 44 percent to 49 percent of the total blocks. The district's construction story, which provides its historical association, is represented through the entire grade separation corridor and its continuity is key in understanding this significance. Therefore, the consideration of a discontiguous district is not advised by historians undertaking the reevaluation.

Revising district boundaries

Mead & Hunt historians considered revising the district boundary to remove the most substantially altered portion of the district from Humboldt to Harriet Avenues (blocks 1-12). When selecting a historic boundary, *How to Apply the National Register Criteria for Evaluation* advises including the full extent of the significant resources and, in the case of historic districts, "the area of land containing significant concentration of buildings, sites, structures, or objects making up the district." The district's significance and integrity should be used to determine a boundary with visual barriers and changes, such as new construction, highways, development, or decline of concentration of contributing resources, as important factors.

The significance of the district lies in its 2.8-mile long grade separation trench constructed as a result of the public's demand to separate pedestrian/vehicular and rail traffic. The grade separation has clear termination points, beginning at Humboldt Avenue and ending at 28th Street. Eliminating a portion, or as much as half, of the grade separation that lacks integrity would not adequately convey the district's significance.

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