

MINNESOTA HISTORIC PRESERVATION OFFICE

February 2, 2017

Ms. Ann Anderson
FHA Loan Analyst
JLL Capital Markets
2177 Youngman Ave, Suite 100
St. Paul, MN 55116

RE: Riverwalk Apartments
Construction of an apartment building at the SE corner of Center St E and Mayo Park Dr SE
Rochester, Olmsted County
MnHPO Number: 2017-0655

Dear Ms. Anderson:

Thank you for continuing consultation on the above project. Information received in our office 5 January 2017 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act of 1966 and implementing federal regulations at 36 CFR 800.

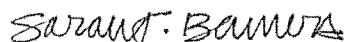
Pursuant to 36 CFR 800.4-5 it is the Federal agency's responsibility to determine the area of potential effect (APE) for the federal undertaking, to identify and evaluate historic properties that may be affected by the proposed federal undertaking, and to assess adverse effects to historic properties, if any. While your submittal dated January 3, 2017 provides baseline information regarding the project site and proposed construction project, you have not provided information sufficient for our office to complete our review of this undertaking. Therefore, in accordance with 36 CFR 800.11(d) we recommend that you submit the following documentation to our office:

- **Determine the Area of Potential Effect.** Based upon the agency's definition of the undertaking, provide a brief written description of the area of potential effect (APE), as specified under 36 CFR 800.4(a)(1) and 36 CFR 800.16(d). Include discussion of the potential for the project to have *direct and indirect* effects on historic properties and provide justification of the boundaries chosen for the APE.
- **Maps** – Provide a copy of a 7.5 Minute USGS topographic map/and or current aerial photograph of the site with the APE for this project clearly delineated. We appreciate the submittal of various aerial views and Sanburn Insurance Maps, as well as the Design Development Drawings (dated 10/27/16) for the apartment building, as these will be helpful as we work through our project review. However, these maps outline the project area, which does not necessarily reflect the APE for this project (see APE discussion above).
- **Identification of Historic Properties.**
 - For archaeological resources – We have reviewed this project relative to effects on archaeological resources and we have determined that the potential for intact archaeological resources is high. Therefore we are recommending that a Phase I archaeological survey be completed for this project. The survey should be conducted by a qualified archaeologist who meets the Secretary of the Interior's professional qualifications standards (36 CFR 61). Guidelines for completing archaeology surveys in Minnesota can be found online at <http://www.mnhs.org/shpo/survey/archsurvey.pdf>. Also, a list of individuals and firms that specialize in this type of work is available on our website [preservationdirectory.mnhs.org](http://www.mnhs.org/preservationdirectory.mnhs.org), select **Archaeologists, Contract** in the **Search by Specialties** box.

- For historic structures – You have indicated that the existing four (4) houses on the project site will be demolished. These include the properties located at 419, 423, 503 and 509 Center Street East. These properties are not included in our statewide historic inventory and additional information is needed on the history of these properties and their surrounding neighborhood in order for us to provide meaningful comment on their eligibility for listing in the National Register of Historic Places (NRHP). Therefore we are recommending that an Architecture-History survey be completed for these properties as well as any other properties located within the APE for this project. The properties should be inventoried and fully evaluated in order to determine their eligibility for listing in the NRHP. An intensive-level survey and evaluation includes in-depth research on the history and construction of the buildings and an evaluation of their significance and historic integrity. The inventory and evaluation should meet the Secretary of the Interior's *Standards for Evaluation* and include consideration of all four National Register Criteria for Evaluation as outlined in 36 CFR 63. The survey should be conducted by a qualified architectural historian or historian who meets the Secretary of the Interior's professional qualifications standards (36 CFR 61). Guidelines for completing history/architecture surveys in Minnesota can be found online at <http://bit.ly/shpoguidelines>. Also, a list of individuals and firms that specialize in this type of work is available on our website preservationdirectory.mnhs.org, select **Historians, Contract** in the **Search by Specialties** box.
- **Determination of Effect** – Once the APE for this project has been delineated and the identification of historic properties completed, provide justification and documentation for the federal agency's determination of effect for this project pursuant to 36 CFR 800.4.
- **Consulting Parties/Public Involvement** – Provide a summary of agency coordination with any other consulting parties and/or public involvement in the Section 106 review process.

We look forward to continuing consultation on this project. Please feel free to contact me if you have any questions regarding our review. I can be reached at (651) 259-3456 or by e-mail at sarah.beimers@mnhs.org.

Sincerely,



Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Ray Stiles, US Dept of Housing and Urban Development, Minneapolis
David Nuccio, US Dept of Housing and Urban Development, Minneapolis