Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

November 2020
Summary

The Rush Line Bus Rapid Transit (BRT) Project (Project) is a proposed 15-mile-long BRT line located in Ramsey County, Minnesota. Operating in both mixed traffic and on a dedicated guideway, the proposed Project would connect the communities of Saint Paul, Maplewood, Vadnais Heights, White Bear Township, Gem Lake, and White Bear Lake. The proposed Project includes 21 stations, three (3) of which are connected to park-and-ride facilities.

The Ramsey County Regional Railroad Authority (RCRRA), in conjunction with the Metropolitan Council, is serving as the local Project lead. In addition to funding from the Federal Transit Administration (FTA), the proposed Project would require an Interstate right-of-way use agreement from the Federal Highway Administration (FHWA) acting through the Minnesota Department of Transportation (MnDOT), and permits from the United States Army Corps of Engineers (USACE). Therefore, the Project is a federal undertaking and must comply with Section 306108 (previously and hereinafter referred to as Section 106) of the National Historic Preservation Act of 1966, as amended (54 United States Code [USC] 300101 et seq.) and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800; Section 101(b)(4) of the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4331); and other applicable federal mandates. The Project intends to seek funding from the State of Minnesota and political subdivisions of the State, and permits for construction from several state agencies. Therefore, the Project must also comply with Minnesota laws, including the Minnesota Environmental Policy Act of 1973 (Minnesota Statute (MS) 116B.01–116B.13), the Minnesota Field Archaeology Act (MS 138.31–138.42), the Minnesota Historic Sites Act (MS 138.661–138.669), and the Minnesota Private Cemeteries Act (MS 307.08), as applicable. Pursuant to 36 CFR Part 800.2(a)(2), the USACE and FHWA have recognized FTA as the lead Federal agency responsible for fulfilling their collective Section 106 obligations for the Project. FTA has delegated the MnDOT Cultural Resources Unit (CRU) limited authority to aid FTA in aspects of the Section 106 process for the Project pursuant to 36 CFR Part 800.2(a)(3).

This report describes the proposed Project, its Area of Potential Effects (APE), efforts to identify and evaluate properties within the Project’s APE to determine their eligibility for listing on the National Register of Historic Places (National Register), and the Project’s potential effects on those properties. FTA has determined that the overall undertaking will have an Adverse Effect on historic properties in the Project’s APE. In particular, based on the Assessment of Effects prepared by the MnDOT CRU, FTA has determined the Project will have an Adverse Effect on five (5) historic properties: the Lake Superior & Mississippi (LS&M) Railroad Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001), three (3) individually eligible 1868 Alignments of the LS&M Railroad (XX-RRD-NPR002, XX-RRD-NPR003, and XX-RRD-NPR004), and the LS&M Railroad Historic District: White Bear Lake to Hugo Segment (XX-RRD-NPR005). In addition, the Project will have No Adverse Effect on 23 historic properties in the Project’s APE with the implementation of conditions for eight (8) of these properties.
This page intentionally left blank
Table of Contents

Summary ........................................................................................................................................................ i
Table of Contents ......................................................................................................................................... iii
  List of Figures .............................................................................................................................................. v
  List of Tables ........................................................................................................................................... vii
Acronyms and Abbreviations ....................................................................................................................... ix
Section 1: Introduction ................................................................................................................................. 1
Section 2: Project Description ....................................................................................................................... 3
  Route ......................................................................................................................................................... 3
  Stations ..................................................................................................................................................... 3
  Park-and-Rides .......................................................................................................................................... 5
  Operations and Maintenance Facilities .................................................................................................... 5
  Bridges ...................................................................................................................................................... 6
  Roadway Improvements ........................................................................................................................... 6
  Noise Barriers ............................................................................................................................................ 6
  Retaining Walls and Stormwater Management Facilities ......................................................................... 6
  Bicycle and Pedestrian Improvements ..................................................................................................... 7
  BRT Operations and Vehicles .................................................................................................................... 7
Section 3: Section 106 of the National Historic Preservation Act ................................................................. 9
  Section 106 Legal and Regulatory Context ............................................................................................... 9
  Section 106 Consultation .......................................................................................................................... 9
    Tribal Consultation ................................................................................................................................ 9
    Agency Coordination ........................................................................................................................... 10
    Project Submittals and Consultation ..................................................................................................... 11
    Public Involvement .............................................................................................................................. 11
Section 4: Identification of Historic Properties ........................................................................................... 13
  Area of Potential Effects .......................................................................................................................... 13
  Identification and Evaluation of Historic Properties .................................................................................. 13
    National Register Criteria .................................................................................................................... 13
    Historic Property Surveys ..................................................................................................................... 14
    Results of Investigations ....................................................................................................................... 15
List of Figures

Figure 1. Overview of Rush Line BRT Project corridor and proposed stations ............................................. 2
Figure 2. Typical Articulated BRT Bus ........................................................................................................... 8
Figure 3. 6th Street to the north of Mears Park, showing a representative example of Lowertown Historic District’s architectural character and streetscape. ...................................................... 26
Figure 4. Union Depot, facing east-northeast ............................................................................................ 28
Figure 5. Union Depot components ........................................................................................................... 28
Figure 6. Finch Building, facing northeast .................................................................................................. 30
Figure 7. Proposed Project plans within the vicinity of historic resources associated with the Lowertown Historic District. .................................................................................................................. 31
Figure 8. Representative example of the Urban Renewal Historic District’s architecture and streetscape, facing southwest down 5th Street. ................................................................................... 35
Figure 9. First National Bank Building of St. Paul and First Farmers and Merchants Bank Building, facing northeast. ........................................................................................................................................... 37
Figure 10. First Bank Addition and First National Bank Building of St. Paul, facing east ......................... 37
Figure 11. Proposed Project plans within the vicinity of historic resources associated with the Urban Renewal Historic District. ............................................................................................................ 39
Figure 12. Configuration of the Pioneer, Endicott, and Endicott Arcade Buildings .................................... 42
Figure 13. Pioneer and Endicott Buildings, facing north ............................................................................. 43
Figure 14. The one-story Endicott Arcade Addition, facing southwest ..................................................... 43
Figure 15. Proposed Project plans within the vicinity of the Pioneer and Endicott Buildings and the Manhattan Building. ..................................................................................................................... 45
Figure 16. Manhattan Building, facing east ............................................................................................... 47
Figure 17. Golden Rule Department Store Building, facing northwest ..................................................... 49
Figure 18. Proposed Project plans within the vicinity of the Golden Rule Department Store Building .... 51
Figure 19. Foot, Schulze & Company Building, looking east. ...................................................................... 53
Figure 20. Proposed Project plans within the vicinity of the Foot, Schulze & Company Building and the Produce Exchange Building ................................................................. 54
Figure 21. Produce Exchange Building, facing west ................................................................................. 56
Figure 22. Great Northern Corridor, in blue ............................................................................................... 58
Figure 23. Great Northern Corridor, crossing under I-35E, facing west ..................................................... 59
Figure 24. StPM&M Railway Company Shops Historic District ................................................................... 60
Figure 25. Westminster Junction from the Lafayette Road Bridge ................................................................ 61
Figure 26. StPS&TF/Omaha Road Railroad Corridor .................................................................................. 65
Figure 27. Boundary of StPS&TF/Omaha Road Railroad Corridor Historic District near the Arcade Street Ramp........................................................................................................................................67

Figure 28. LS&M Mainline Railroad Corridor..................................................................................................................................................................................72

Figure 29. Typical view along the Bruce Vento Regional Trail in Maplewood, facing south........................................77

Figure 30. Typical buffer and screening treatment illustrating vegetative buffers on either edge of the right-of-way and between the dedicated BRT roadway and the trail..............................................................77

Figure 31. Proposed Project Plans in the vicinity of the 1868 Alignment of LS&M Railroad between County Road C and Gervais Avenue (XX-RRD-NPR003)...........................................................................................................................78

Figure 32. Proposed Project Plans in the vicinity of the 1868 Alignment of the LS&M Railroad between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002). ..........................................................................................................................79

Figure 33. Proposed Project Plans in the vicinity of the 1868 Alignment of the LS&M Railroad between Eldridge Avenue East and County Road B East (XX-RRD-NPR004). ..........................................................................................................................79

Figure 34. Visualization of typical station, trail, and dedicated BRT roadway ..........................................................................................................................80

Figure 35. Proposed Project Plans in the vicinity of the Highway 36 Park-and-Ride Facility. .........................................................82

Figure 36. Harvest Park.................................................................................................................................................................................................83

Figure 37. Intact portions of the railroad roadway following completion of project...............................................................................................88

Figure 38. Railroads in Minneapolis-Saint Paul Area..................................................................................................................................................89

Figure 39. Contributing and noncontributing resources of the Hamm’s Brewing Company Complex ....91

Figure 40. Proposed Project plans within the vicinity of Hamm’s Brewing Company Complex.................................................................92

Figure 41. Hamm’s Brewing Company Complex.............................................................................................................93

Figure 42. 3M Administration Building, facing southwest.................................................................................................................................95

Figure 43. Proposed Project plans within the vicinity of the 3M Administration Building.................................................................96

Figure 44. From left to right, East Shore Drive (RA-XXX-001) and the Bruce Vento Regional Trail (RA-SPC-11121) east of Phalen Park, view looking northeast. ...............................................................98

Figure 45. Proposed Project plans within the vicinity of Phalen Park.................................................................................................99

Figure 46. Johnson Parkway........................................................................................................................................................................102

Figure 47. Johnson Parkway.................................................................................................................................................................104

Figure 48. Proposed Project plans within the vicinity of Johnson Parkway...............................................................105

Figure 49. Site 21RA70.................................................................................................................................................................................108

Figure 50. Proposed Project plans within the vicinity of the Gladstone Shops.......................................................................................109

Figure 51. Moose Lodge 963, facing northwest.................................................................................................................................111

Figure 52. Proposed Project plans within the vicinity of Moose Lodge 963...........................................................................................112

Figure 53. Eastern wing of Weaver Elementary School with Midcentury Modern brick screens on the entrance walkway, facing southwest........................................................................................................114

Figure 54. Proposed Project plans within the vicinity of Madeline L. Weaver Elementary School........115
Figure 55. Polar Chevrolet Bear on its original pedestal in 1976, and in its current location. ............... 117
Figure 56. Proposed Project plans within the vicinity of the Polar Chevrolet Bear.............................. 119

List of Tables

Table 1. Hours of Operation and Frequency............................................................................................... 7
Table 2. Historic Properties Listed In or Determined Eligible for Inclusion in the National Register ....... 15
Table 3. Lowertown Historic District Resources in the Project APE ........................................................ 24
Table 4. Urban Renewal Historic District Resources in the Project APE ............................................... 33
Table 5. StPS&TF/Omaha Road Resources in the Project APE................................................................. 65
Table 6. LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Resources in the Project APE ............................................................................................................... 70
Table 7. Summary of Effects Findings ..................................................................................................... 121
This page intentionally left blank
Acronyms and Abbreviations

ACHP  Advisory Council on Historic Preservation
ADA  Americans with Disabilities Act
APE  Area of Potential Effects
BAT  Business Access and Transit
BMP  Best Management Practice
BNSF  Burlington Northern Santa Fe
BRT  Bus Rapid Transit
C  Contributing
CFR  Code of Federal Regulations
CPPHP  Construction Protection Plan for Historic Properties
CRU  Cultural Resources Unit
EA  Environmental Assessment
FTA  Federal Transit Administration
FHWA  Federal Highway Administration
HPC  Heritage Preservation Commission
I-  Interstate (i.e., I-35E, I-94, I-694)
LOD  Limits of Disturbance
LS&M  Lake Superior & Mississippi
MnDOT  Minnesota Department of Transportation
MnSHPO  Minnesota State Historic Preservation Office
MPDF  Multiple Property Documentation Form
MS  Minnesota Statute
National Register  National Register of Historic Places
NC  Noncontributing
NEPA  National Environmental Policy Act
Project  Rush Line Bus Rapid Transit Project
RCRRA  Ramsey County Regional Railroad Authority
### Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 106</td>
<td>Section 306108 of the National Historic Preservation Act</td>
</tr>
<tr>
<td>SHPO</td>
<td>State Historic Preservation Officer</td>
</tr>
<tr>
<td>SOI</td>
<td>Secretary of the Interior</td>
</tr>
<tr>
<td>SOI Standards</td>
<td>Secretary of the Interior’s Standards for the Treatment of Historic Properties</td>
</tr>
<tr>
<td>StP&amp;D</td>
<td>St. Paul and Duluth</td>
</tr>
<tr>
<td>StPM&amp;M</td>
<td>St. Paul, Minneapolis, and Manitoba</td>
</tr>
<tr>
<td>StPS&amp;TF</td>
<td>Saint Paul, Stillwater &amp; Taylors Falls</td>
</tr>
<tr>
<td>TH</td>
<td>Trunk Highway</td>
</tr>
<tr>
<td>THPO</td>
<td>Tribal Historic Preservation Officer</td>
</tr>
<tr>
<td>TOD</td>
<td>Transit Oriented Development</td>
</tr>
<tr>
<td>U.S.</td>
<td>United States</td>
</tr>
<tr>
<td>USACE</td>
<td>United States Army Corps of Engineers</td>
</tr>
<tr>
<td>USC</td>
<td>United States Code</td>
</tr>
<tr>
<td>3M</td>
<td>Minnesota Mining and Manufacturing Company</td>
</tr>
<tr>
<td>%</td>
<td>Percent</td>
</tr>
</tbody>
</table>
Section 1: Introduction

The Rush Line Bus Rapid Transit (BRT) Project (Project) is a proposed 15-mile-long BRT line located in Ramsey County, Minnesota (Figure 1). Operating in both mixed traffic and on a dedicated guideway, the proposed Project would connect the communities of Saint Paul, Maplewood, Vadnais Heights, White Bear Township, Gem Lake, and White Bear Lake. The proposed Project includes 21 stations, three (3) of which are connected to park-and-ride facilities.

The Ramsey County Regional Railroad Authority (RCRRA), in conjunction with the Metropolitan Council, is serving as the local Project lead. In addition to funding from the Federal Transit Administration (FTA), the proposed Project would require an Interstate right-of-way use agreement from the Federal Highway Administration (FHWA) acting through the Minnesota Department of Transportation (MnDOT), and permits from the United States Army Corps of Engineers (USACE). Therefore, the Project is a federal undertaking and must comply with Section 306108 (previously and hereinafter referred to as Section 106) of the National Historic Preservation Act of 1966, as amended (54 United States Code [USC] 300101 et seq.) and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800; Section 101(b)(4) of the National Environmental Policy Act (NEPA) of 1969, as amended (42 USC 4331); and other applicable federal mandates. The proposed Project intends to seek funding from the State of Minnesota and political subdivisions of the State, and permits for construction from several state agencies. Therefore, the Project must also comply with Minnesota laws, including the Minnesota Environmental Policy Act of 1973 (Minnesota Statute (MS) 116B.01–116B.13), the Minnesota Field Archaeology Act (MS 138.31–138.42), the Minnesota Historic Sites Act (MS 138.661–138.669), and the Minnesota Private Cemeteries Act (MS 307.08), as applicable. This assessment of effects report facilitates compliance with these legislative requirements.¹

Pursuant to 36 CFR Part 800.2(a)(2), the USACE and FHWA have recognized FTA as the lead Federal agency responsible for fulfilling their collective Section 106 obligations for the Project. In 2018, FTA delegated the MnDOT Cultural Resources Unit (CRU) limited authority to aid FTA in aspects of the Section 106 process for the Project pursuant to 36 CFR Part 800.2(a)(3).² This report, prepared by MnDOT CRU staff, describes the Preferred Alternative for the Project; outlines the legal and regulatory requirements for Section 106; summarizes efforts to identify and evaluate historic properties that could be potentially affected by the Project, based on the Project’s 15 Percent (%) Plans (Appendix A); presents an assessment of Project effects on historic properties located within the Project Area of Potential of Effects (APE), as delineated in February 2020 (Appendix B); and describes FTA’s determination of effect on historic properties for the undertaking.

As Project design work advances, FTA will review the Project’s 30%, 60%, 90%, and 100% Plans, and any modifications to the 100% Plans, and assess whether any Project design changes would result in changes to FTA’s finding of effect included in this report. If FTA concludes that any previously made finding no longer remains valid, FTA will make a new finding of effect and consult with consulting parties as appropriate to consider the effect and ways to resolve any adverse effects.

¹ The Metropolitan Council, Ramsey County, and MnDOT may be able to use the studies prepared under the Rush Line BRT to help meet their responsibilities under Minnesota Statute.
² Jay Ciavarella, FTA, letter to Sarah J. Beimers, MnSHPO, September 5, 2018.
Figure 1. Overview of Rush Line BRT Project corridor and proposed stations
Section 2: Project Description

The proposed Project is a 15-mile-long BRT line located in Ramsey County, Minnesota. Operating in both mixed traffic and on a dedicated guideway, the BRT line extends along a northerly and easterly alignment, connecting downtown Saint Paul with the suburban cities of Maplewood, Vadnais Heights, Gem Lake, and White Bear Lake. The proposed Project includes 21 stations and three (3) park-and-rides, two (2) using existing surface lots and/or parking structures, and the other requiring the construction of a new parking structure. The proposed Project would also include pedestrian and bicycle access; roadway, streetscape, and landscape improvements; and restructured local bus route connections. Project development is at 15% design (see 15% Plans in Appendix A). A more detailed description of proposed Project elements is included below.

Route

Much of the proposed 15-mile-long BRT route would be on or parallel to existing city, county, and state roadways, either in mixed traffic or in a dedicated guideway as illustrated in Figure 1 above. According to Project documentation, the northbound direction would have 11.8 miles (78% of the route) in dedicated guideway and the southbound direction would have 11.2 miles (74% of the route) in dedicated guideway. Dedicated guideway is defined as the pavement area designed and designated for exclusive use by transit vehicles and, if needed, emergency vehicles.\(^3\)

Approximately four (4) miles of the dedicated guideway is a dedicated BRT roadway separated from existing vehicular roadways. The dedicated BRT roadway would consist of a two (2)-lane concrete roadway with one (1) lane in each direction. Lanes would typically be 13 feet in width (26 feet wide total). The dedicated BRT roadway would be built in the Ramsey County rail right-of-way from Johnson Parkway to Beam Avenue and from County Road D to Buerkle Road. Ramsey County purchased the rail right-of-way, which was originally part of the Lake Superior & Mississippi (LS&M) Railroad Corridor and is identified as a historic property as part of this Project (XX-RRD-NPR001, see below), in the early 1990s to reserve it for future transit use. The location of Bruce Vento Regional Trail currently within this rail right-of-way would be shifted to accommodate the construction of the dedicated BRT roadway.

The remainder of the Project’s dedicated guideway would consist of business access and transit (BAT) lanes running adjacent to existing vehicular roadways. Non-transit and non-emergency vehicles can only use BAT lanes at intersections and driveways to make right turns. These lanes would range from 11 to 15 feet in width. In a few instances, the number of traffic or parking lanes may be reduced or existing shoulders would be expanded to accommodate the Project.

For the purposes of this report, “dedicated BRT roadway” and “dedicated BAT lane” will be used to distinguish between the different types of dedicated guideways.

Stations

The proposed Project would include 21 stations, as depicted in Figure 1 above. However, four (4) platforms in downtown Saint Paul would be constructed under the METRO Gold Line Project.\(^4\) The stations and associated platforms are as follows:

---

\(^3\) Environmental Assessment: Rush Line Bus Rapid Transit Project, DRAFT, dated September 2020, Section 2.3.1.

\(^4\) These serve the 5th/6th Street Station and the Union Depot Station. The METRO Gold Line is a proposed BRT project that will connect Saint Paul, Maplewood, Landfall, Oakdale, and Woodbury generally along I-94. It is
• Union Depot Station: This station includes the existing Union Depot Bus Deck Platform and new platforms on Sibley and Wacouta Streets (Sheets 4 and 32 of the 15% Plans). Although BRT elements at the Union Depot Bus Deck Platform would be constructed as part of the Rush Line BRT Project, the Sibley and Wacouta Street Platforms would be constructed as part of the METRO Gold Line Project.

• 5th/6th Street Station: This station includes new platforms on 5th and 6th Streets (Sheets 4 and 5 of the 15% Plans, respectively). Both platforms would be constructed as part of the METRO Gold Line Project.

• 10th Street Station: This station includes new, paired (i.e., directly across from each other) platforms on Robert Street north of 10th Street (Sheet 5 of the 15% Plans).

• 14th Street Station: This station includes new, paired platforms on East 14th Street west of Jackson Street (Sheet 5 of the 15% Plans).

• Mt. Airy Street Station: This station includes new, paired platforms on Jackson Street north of Mt. Airy/Winter Street (Sheet 6 of the 15% Plans).

• Olive Street Station: This station includes new, offset platforms on Phalen Boulevard. The northbound platform is east of Olive Street and the southbound platform is west of Olive Street (Sheet 7 of the 15% Plans).

• Cayuga Street Station: This station includes new, offset platforms on Phalen Boulevard. The northbound platform is east of Cayuga Street and the southbound platform is west of Cayuga Street (Sheet 7 of the 15% Plans).

• Payne Avenue Station: This station includes new, paired platforms on Phalen Boulevard west of Payne Avenue (Sheet 8 of the 15% Plans).

• Arcade Street Station: This station includes new, paired platforms on Neid Lane west of Arcade Street (Sheet 9 of the 15% Plans).

• Cook Avenue Station: This station includes new, offset platforms on either side of the dedicated BRT roadway (Sheet 11 of the 15% Plans). The northbound platform is north of a new sidewalk connection and the southbound platform is south of the sidewalk connection.

• Maryland Avenue Station: This station includes new, offset platforms on either side of the dedicated BRT roadway. The northbound platform is north of Maryland Avenue and the southbound platform is south of Maryland Avenue (Sheet 12 of the 15% Plans).

• Larpenteur Avenue Station: This station includes new, paired platforms on either side of the dedicated BRT roadway north of Larpenteur Avenue (Sheets 13 and 30 of the 15% Plans).

• Frost Avenue Station: This station includes new, paired platforms on either side of the dedicated BRT roadway north of Frost Avenue (Sheet 14 of the 15% Plans).

• Highway 36 Station: This station includes new, paired platforms on either side of the dedicated BRT roadway north of Gervais Avenue (Sheets 17 and 17A of the 15% Plans).

• Maplewood Mall Transit Center: This station includes improvements at exiting platforms at the Maplewood Mall Transit Center (Sheets 20 and 36 of the 15% Plans).

• St. John’s Boulevard Station: This station includes new, offset platforms on either side of the Hazelwood Street. The northbound platform is north of St. John’s Boulevard and the southbound platform is south of St. John’s Boulevard (Sheet 19 of the 15% Plans).

---

expected to begin service in 2024 (before Rush Line BRT). More information on the METRO Gold Line is available at https://www.metrotransit.org/gold-line-project.
• Buerkle Road Station: This station includes new, paired platforms on either side of the dedicated BRT roadway south of Buerkle Road (Sheet 21 of the 15% Plans).
• County Road E Station: This station includes new, paired platforms on either side of TH 61 south of County Road E (Sheets 23 and 37 of the 15% Plans).
• Cedar Avenue Station: This station includes new, paired platforms on either side of TH 61 north of Cedar Avenue (Sheet 25 of the 15% Plans).
• Whitaker Street Station: This station includes new, offset platforms on either side of TH 61. The northbound platform is north of Whitaker Street and the southbound platform is south of Whitaker Street (Sheet 27 of the 15% Plans).
• Downtown White Bear Lake Station: This station includes a single new platform on the east side of Washington Avenue, between 7th and 8th Streets (Sheet 29 of the 15% Plans).

Station platforms would generally be 10 inches high, allowing both BRT and local buses to use the same platforms. Typical platforms would be 60 to 80 feet long (see typical plans on Sheets 80–83 of the 15% Plans). At some stations, including southbound 10th Street, 14th Street, Mt. Airy Street, Maplewood Mall Transit Center, and Downtown White Bear Lake, BRT platforms would be combined with local bus stops or extended to accommodate multiple buses, resulting in a total bus platform length of approximately 130 feet. The roof shape and architectural design of stations are unknown at 15% design and will be determined later. Stations would include ticket machines for off-board fare purchase, real-time bus schedule information, bicycle parking, on-demand heat, trash and recycling bins, emergency telephones, security cameras, energy-efficient station lighting, and information about the station, route, transit system and neighborhood.

Park-and-Rides
The Build Alternative would serve one (1) existing park-and-ride and two (2) proposed park-and-ride:

• Highway 36: This is a new parking structure with 300 parking spaces (see Sheets 17, 34, and 35 of the 15% Plans). The parking structure would also provide some parking for Harvest Park and Bruce Vento Regional Trail users. A Build Alternative option without this park-and-ride is also being investigated (see Sheet 17A of the 15% Plans).
• Maplewood Mall Transit Center: This is an existing parking structure and surface lot with 1,000 parking spaces. Improvements would be made to the station platforms and customer waiting area. No new parking would be constructed (see Sheets 20 and 36 of the 15% Plans).
• County Road E: This is an existing surface parking lot for the TCO (Twin Cities Orthopedics) Sports Garden, owned by Ramsey County. A portion of the lot would be reconfigured to accommodate 70 parking spaces for transit use (see Sheets 23 and 37 of the 15% Plans).

Operations and Maintenance Facilities
The proposed Project would not construct a new operations and maintenance facility. The buses would be serviced at the East Metro Garage, an existing Metro Transit operations and maintenance facility in Saint Paul (see location on Sheet 34 of the 15% Plans). Electric charging stations would be added to the interior of the existing facility, which would not reduce the facility’s current capacity of 214 buses. Some

---

5 Metro Transit is not the planned owner or manager of the proposed Highway 36 park-and-ride, and an alternative ownership commitment has not been made at this time.
of the current buses assigned to this facility would be assigned to another facility to provide space for Rush Line BRT vehicles.

Bridges
The proposed Project includes seven (7) new bridges along the route to facilitate operations. Although the bridges have not been given formal names, for the purposes of this report they will be referred to as follows:

- Arcade Street Ramp: This bridge would transition BRT vehicles between the existing Arcade Street Bridge (MnDOT Bridge 62062) and the dedicated BRT roadway in the Ramsey County rail right-of-way north of Phalen Boulevard (see Sheets 9, 47, and 48 of the 15% Plans).
- Johnson Parkway Bridge: This bridge would carry the dedicated BRT roadway and Bruce Vento Regional Trail over Johnson Parkway (see Sheets 11 and 52 of the 15% Plans).
- Gateway Trail Underpass: This bridge would carry the dedicated BRT roadway over the Gateway State Trail. In addition, the new location of the Bruce Vento Regional Trail transitions between the east and west sides of the dedicated BRT roadway under this bridge (see Sheet 15 of the 15% Plans).
- Weaver Trail Underpass: This bridge would carry the dedicated BRT roadway over the trail connection between English Street and Weaver Elementary School (see Sheet 15 of the 15% Plans).
- Highway 36 Bridge: This bridge would carry the dedicated BRT roadway over Trunk Highway (TH) 36 (see Sheets 16 and 55 of the 15% Plans).
- Fitch/Barclay Trail Underpass: This bridge would carry the dedicated BRT roadway over the trail connection between Fitch Road and Barclay Street (see Sheet 18 of the 15% Plans).
- I-694 Bridge: This bridge would carry the dedicated BRT roadway over Interstate-694 (I-694, see Sheets 21 and 60 of the 15% Plans).

Roadway Improvements
The proposed Project includes long-term physical modifications to existing roadways and intersections affecting local circulation patterns. These changes would accommodate the introduction of the BRT alignment and related facilities, improve access, and improve connectivity. Roadway improvements include mill and overlay; turn lane additions; reconfiguration of lanes, widths, and parking; alignment shifts; and construction of new overpasses.

Noise Barriers
The proposed Project does not include the removal, relocation, or construction of noise barriers.

Retaining Walls and Stormwater Management Facilities
The proposed Project includes retaining walls and stormwater management facilities throughout the Project corridor. Although potential locations for these Project elements are delineated on the 15% Plans, the exact size and design will be determined at a later date. In some cases, the Project elements may be removed from consideration. Stormwater management facilities, including linear and stand-alone facilities, are illustrated on the 15% Plans as “Potential Stormwater Best Management Practice (BMP) Locations.” To facilitate references to the 15% Plans, this report refers to these facilities as BMPs.
Bicycle and Pedestrian Improvements
As noted in the description of the BRT route above, the location of Bruce Vento Regional Trail currently within the rail right-of-way would be shifted to accommodate the construction of the dedicated BRT roadway. The newly constructed trail within the right-of-way would typically be 12 feet wide. The Project intends to follow the guidance outlined in the Ramsey County Rail Right-of-Way Design Guide, produced as part of the Rush Line BRT Project, as part of design development within the rail right-of-way.6

The proposed Project also includes a variety of bicycle and pedestrian improvements to provide safe bicycle and pedestrian crossings of the proposed BRT alignment, to accommodate the proposed BRT and roadway improvements, and/or to provide bicycle and pedestrian connections to the proposed BRT stations. These improvements would affect several trails and sidewalks within the vicinity of the Project and include, but are not limited to, construction of curb ramps and detectable warnings compliant with the American with Disabilities Act (ADA) and relocations of regional and local trails and sidewalks along much of the alignment outside of downtown Saint Paul. It also includes a number of new trail and sidewalk connections to provide easy access to stations and fill gaps between existing facilities and station areas.

BRT Operations and Vehicles
The BRT vehicles would operate from 5 a.m. to midnight on weekdays and Saturdays and from 6 a.m. to 10 p.m. on Sundays. Table 1 provides the assumed operating frequencies during these hours.

<table>
<thead>
<tr>
<th>Day of Week</th>
<th>Start Time</th>
<th>End Time</th>
<th>Frequency (minutes)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weekdays</td>
<td>5 a.m.</td>
<td>6 a.m.</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>6 a.m.</td>
<td>9 a.m.</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>9 a.m.</td>
<td>3 p.m.</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>3 p.m.</td>
<td>6:30 p.m.</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>6:30 p.m.</td>
<td>12 a.m.</td>
<td>15</td>
</tr>
<tr>
<td>Saturdays</td>
<td>5 a.m.</td>
<td>12 a.m.</td>
<td>15</td>
</tr>
<tr>
<td>Sundays</td>
<td>6 a.m.</td>
<td>10 p.m.</td>
<td>15</td>
</tr>
</tbody>
</table>

The Build Alternative would use 60-foot articulated electric buses (Figure 2). A charging station would be constructed at the Union Depot Bus Deck Platform at the Union Depot Station, where buses would charge for about 10 minutes during layovers. Additional charging stations would also be installed at the East Metro Garage, as discussed in Operations and Maintenance above. Buses would operate at speeds ranging from five (5) miles per hour (mph) to 50 mph, depending on location and whether they are in mixed traffic, the dedicated BRT roadway, or a dedicated BAT lane. In downtown Saint Paul, buses would primarily operate up to 25 mph in mixed traffic and in dedicated BAT lanes. Outside of downtown Saint Paul, buses would operate at the posted speeds of between 25 and 45 mph in areas where they operate in mixed traffic and in dedicated BAT lanes. On the dedicated BRT roadway, buses would

operate at speeds up to 45 mph. Finally, along TH 61, buses would operate in dedicated BAT lanes and mixed traffic up to the posted speeds of 30 to 50 mph.\footnote{Cross-Spectrum Acoustics Inc., “Noise and Vibration Technical Report, Draft,” Table 9.}

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{Figure2.png}
\caption{Typical Articulated BRT Bus}
\end{figure}
Section 3: Section 106 of the National Historic Preservation Act

Section 106 Legal and Regulatory Context
Prior to implementing an undertaking, Section 106 of the National Historic Preservation Act requires Federal agencies to consider the effects of the undertaking on historic properties, which are properties listed in or eligible for inclusion in the National Register of Historic Places (National Register). Undertakings include projects a federal agency carries out, approves, licenses, or funds. Federal agencies must also provide the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the undertaking prior to the agency making a decision.

As described in 36 CFR Part 800, the Section 106 process includes the following steps:

- Initiation of the Section 106 process:
  - Establish the undertaking;
  - Notify the State Historic Preservation Officer (SHPO) and any Tribal Historic Preservation Officers (THPOs);
  - Plan to involve the public; and
  - Identify other consulting parties, including tribes.

- Identification of historic properties:
  - Determine the APE; and
  - Complete a survey of the APE to identify historic properties that are listed in or eligible for inclusion in the National Register.

- Assessment of adverse effects:
  - Apply criteria of adverse effect.

- Resolution of adverse effects:
  - Continue consultation to consider measures to avoid, minimize, or mitigate adverse effects;
  - Reach agreement with the SHPO, any THPOs, and the ACHP (if it chooses to participate in the consultation); and
  - Prepare a Section 106 agreement to document measures that will be implemented by the Federal agency to avoid, minimize, and/or mitigate adverse effects.

Section 106 Consultation
FTA initiated Section 106 consultation for the Project in 2018, and in accordance with 36 CFR Part 800.3, has regularly consulted with the Minnesota State Historic Preservation Office (MnSHPO), Indian tribes, local governments, and other parties with a demonstrated interest to consider effects of the Project on historic properties.

Tribal Consultation
In July 2018, the FTA sent letters to Indian tribes with an interest in the portion of the state where the Project would be built, requesting that they identify whether there were places of traditional religious or cultural importance to the tribe within the vicinity of the proposed Project, and inviting them to participate in further consultation. Letters were sent to the Lower Sioux Indian Community, Upper Sioux Community, Prairie Island Indian Community, Shakopee Mdewakanton Sioux Community, Turtle Mountain Band of Chippewa, Sisseton-Wahpeton Oyate, Santee Sioux Nation, and Fort Peck Assiniboine and Sioux Tribes. No responses were received.
To date, the FTA has not identified cultural resources with potential significance to tribes within the Project’s APE. If such resources are identified in the future, consultation will proceed in accordance with Section 106 requirements.

Agency Coordination

In July 2018, the FTA sent letters to local governments within the Project area, requesting their involvement in Section 106 consultation for the Project. Letters were sent to Ramsey County; the Cities of Gem Lake, Maplewood, Saint Paul, Vadnais Heights, and White Bear Lake; White Bear Lake Township; and the Maplewood and Saint Paul Heritage Preservation Commissions (HPCs). All but the City of Gem Lake and the Maplewood HPC responded to the invitation. In addition to formal consultation under Section 106, representatives from local governments sit on three (3) committees providing guidance to the Project: the Policy Advisory Committee, Community Advisory Committee, and the Technical Advisory Committee, including its Issue Resolution Teams. MnDOT CRU attends committee meetings to address any questions or concerns that arise related to Section 106 activities.

In September 2018, the FTA sent a letter to MnSHPO initiating Section 106 consultation for the undertaking and authorizing MnDOT CRU and RCRRA “to prepare Section 106 documentation, analyses, and recommendations to inform the FTA determinations” and “to consult directly with the [MnSHPO] on technical matters related to Section 106 documentation and analysis as well as to disseminate information to, and coordinate and schedule meetings with, consulting parties in coordination with FTA.”

In April 2019, the FTA notified USACE that the Project requires a Clean Water Act Section 404 permit and invited the USACE to designate FTA as the lead Federal agency under 36 CFR 800.2(a)(2). In November 2019, USACE agreed that FTA should act as the lead Federal agency for the purposes of fulfilling their collective responsibilities under Section 106 and indicated that USACE would like to remain a Section 106 consulting party.

On September 15, 2020, the FHWA notified the FTA that the Project requires the use of Interstate right-of-way and invited FTA to be the lead Federal agency under 36 CFR 800.2(a)(2). On September 25, 2020, FTA accepted lead Federal agency status for the purposes of fulfilling FTA’s and FHWA’s collective responsibilities under Section 106. FHWA remains a Section 106 consulting party and will be an invited signatory for any Section 106 agreements developed for the Project.

---

8 Jay Ciavarella, FTA, letter to Sarah J. Beimers, MnSHPO, September 5, 2018. This letter was resubmitted to MnSHPO on February 27, 2019, after MnDOT CRU determined that MnSHPO had not received the original submittal. On March 29, 2019, MnSHPO accepted the initiation of Section 106 consultation and assigned SHPO Number 2019-0985 to the Project. Sarah J. Beimers, MnSHPO, letter to Jay Ciavarella, FTA, March 29, 2019.
9 Kelley Brookins, FTA, letter to Chad Konickson, USACE, April 5, 2019; Marissa Merriman, USACE, letter to Kelley Brookins, FTA, November 8, 2019.
10 Joe Campbell, FHWA, letter to Kelley Brookins, FTA, September 15, 2030; Kelley Brookins, FTA, letter to Joe Campbell, FHWA, September 25, 2020.
Project Submittals and Consultation
To partially comply with Section 106 requirements, FTA made the following submittals to MnSHPO and other consulting parties for their review and comment:

- May 9, 2019: Phase I Architecture/History Survey, Batch 01
- June 28, 2019: Phase I Architecture/History Survey, Batch 02
- October 29, 2019: Draft APE
- December 13, 2019: Phase I Architecture/History Survey, Batch 03
- February 19, 2020: Final APE
- June 4, 2020: Phase IA, I, and II archaeological investigations and Phase II evaluation of the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment
- July 10, 2020: Phase I and II architecture/history investigations

A consulting party meeting was held on July 16, 2020, to discuss the results of the identification efforts. As a result of discussions at that meeting, the FTA added the Maplewood Area Historical Society and the White Bear Lake Area Historical Society to the list of Section 106 consulting parties. On October 6, 2020, the FTA invited the following entities to become consulting parties: Ramsey County Historical Society, LS&M Railroad, Minnesota Transportation Museum, and Northern Pacific Railway Historical Association. The Minnesota Transportation Museum declined to participate; none of the other entities responded.11

Additional consultation with MnSHPO and Section 106 consulting parties will continue to consider potential effects on historic properties as outlined in this report and to resolve adverse effects.

Public Involvement
In accordance with 36 CFR Part 800.8, Section 106 consultation efforts were coordinated with the NEPA process and related outreach activities and events. In particular, opportunities for the public to review information and provide comments related to steps in the Section 106 process were incorporated, as appropriate, into public meetings related to the NEPA and design and engineering processes. The opportunities included public meetings of the Policy Advisory Committee and the Community Advisory Committee and public engagement related to the Ramsey County Rail Right-of-Way Design Guide. Additional information will be provided to the public at open houses to be held for the EA and Section 106 document will be posted to the project website.

---

Section 4: Identification of Historic Properties

Area of Potential Effects

An APE is “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking” (36 CFR Part 800.16[d]). An APE must account for both direct and indirect effects, including temporary, permanent, and cumulative effects.

The FTA, with the assistance of MnDOT CRU and in consultation with MnSHPO and other consulting parties, delineated an APE for the Project in February 2020 based on the Project’s plans as of July 25, 2019 (see Appendix B). The APE was reviewed when the 15% Plans were finalized on August 7, 2020, for the purposes of the draft EA and this assessment of effects and no changes are required. FTA will review the APE at each successive step in design development to ensure it remains appropriate throughout the course of the Project.

Identification and Evaluation of Historic Properties

Section 106 requires Federal agencies to consider the effects of their undertakings on historic properties, which are those that are listed in, or eligible for inclusion in, the National Register. The National Register is the nation’s official list of historic places worthy of preservation. Historic property surveys of architecture/history and archaeological resources were undertaken to identify and evaluate historic properties located within the Project’s APE.

National Register Criteria

In order to qualify for inclusion in the National Register, a property must possess significance under at least one (1) of four (4) criteria:

A. Association with events that have made significant contributions to broad patterns of history.
B. Association with the lives of persons significant in our past.
C. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
D. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to possessing significance, to be eligible for the National Register a property must also retain sufficient historic integrity or “the ability of a property to convey its significance.” There are seven (7) aspects or qualities that must be considered when determining whether a property retains integrity:

- Location: the place where the property was constructed or the place where the significant event occurred;

---

13 National Park Service, 36 CFR Part 60.4 Criteria for Evaluation.
14 National Park Service, National Register Bulletin: How to Apply the National Register Criteria for Evaluation, 44.
• Design: the combination of elements that create the form, plan, space, structure, and style of a property;
• Setting: the physical environment of a property;
• Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a property;
• Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;
• Feeling: a property's expression of the aesthetic or historic sense of a particular period of time; and
• Association: the direct link between an important historic event or person and a historic property.

Historic Property Surveys

In order to streamline the identification process for the Project, architecture/history survey and archaeological investigations began prior to the finalization of the Project’s APE. As a result, the architecture/history survey area extends beyond the APE in several locations. The archaeological investigations focused on locations of proposed ground disturbance (often described as the “limits of disturbance” or LOD) and, therefore, the archaeological survey area is smaller than the APE in several locations. FTA has identified all known historic properties in the APE based on the results of the following survey reports:

• *Phase IA Literature Review, Phase I Archaeological Investigations and Phase II Archaeological Investigations of 21RA82 for the Rush Line BRT Project, Ramsey County, Minnesota* (Mississippi Valley Archaeology Center, 2020): Archaeological investigations focused on areas where ground-disturbing activities have the potential to affect archaeological resources. Mississippi Valley Archaeology Center (MVAC) conducted archaeological investigations for the Project during the fall of 2018 and spring of 2019. The results of their investigations are summarized in a report submitted to consulting parties in June 2020. MnSHPO concurred with the results of archaeological investigation in a letter dated August 4, 2020.

• *Phase I Architecture/History Survey and Phase II Evaluation for the Rush Line Bus Rapid Transit Project Ramsey County, Minnesota* (Mead & Hunt, 2020): Architecture/history investigations included properties built prior to 1979, representing 45 years prior to the date Project construction is anticipated to begin (originally anticipated to be 2023). Mead & Hunt conducted architecture/history investigations for the Project beginning in June 2018 and continuing through May 2020. The results of their work was submitted to consulting parties over the course of 2019 and summarized in a report submitted to consulting parties in July 2020. In a letter dated September 15, 2020, MnSHPO concurred with the results of the architecture/history investigation, with three (3) exceptions. The FTA responded to the concerns in a letter dated October 2, 2020. MnSHPO concurred with the results of the architecture/history investigation in a letter dated October 30, 2020.\(^\text{15}\)

\(^{15}\) In their September 15, 2020 letter, MnSHPO disagreed with FTA’s finding that the First Evangelical Lutheran Church (RA-WBC-0174) is National Register–eligible; the FTA deferred to MnSHPO’s opinion and removed the property from consideration within this assessment of effects. MnSHPO also requested additional information on the Lions and Lioness Hall (RA-MWC-0136) and Mount Airy Homes Public Housing Complex (RA-SPC-5915). In their October 2, 2020 letter, FTA disagreed, noting additional research and evaluation would not be consistent with the
Phase II Evaluation Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (SHPO Inventory Number: XX-RRD-NPR001), Rush Line Bus Rapid Transit Project, Ramsey County, Minnesota (Mead & Hunt and Mississippi Valley Archaeology Center, 2020): A portion of the former mainline of the LS&M Railroad, previously determined eligible for inclusion in the National Register, is located within the APE. MnDOT CRU determined supplemental information would be need to adequately assess effects because the historic property is proposed to be directly and physically affected by the Project. The Phase II evaluation was prepared jointly by Mead & Hunt and MVAC and summarized in a report submitted to consulting parties in June 2020. MnSHPO concurred with the results of the evaluation in a letter dated August 4, 2020.

Results of Investigations

In total, 28 properties either listed in, or eligible for inclusion in, the National Register have been identified within the Project’s APE (see Table 2 and Appendix B). This includes two (2) properties that are being treated as eligible for inclusion in the National Register for the purposes of the Rush Line BRT Project (Johnson Parkway and Site 21RA70). A description and summary of each property’s National Register significance is included in Section 5. To inform the assessment of effects, each summary includes the National Register Criteria, area(s) of significance, and period(s) of significance identified for the property.

Table 2. Historic Properties Listed In or Determined Eligible for Inclusion in the National Register

<table>
<thead>
<tr>
<th>Inventory or Site Number</th>
<th>Property Name</th>
<th>Address</th>
<th>City</th>
<th>National Register Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-4580</td>
<td>Lowertown Historic District</td>
<td>Roughly bounded by Shepard Road, Kellogg Boulevard, Broadway Street, 7th Street, and Sibley Street</td>
<td>Saint Paul</td>
<td>Listed</td>
</tr>
<tr>
<td>RA-SPC-5225</td>
<td>Saint Paul Union Depot</td>
<td>214 East 4th Street</td>
<td>Saint Paul</td>
<td>Listed; Lowertown: C</td>
</tr>
<tr>
<td>RA-SPC-6907</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RA-SPC-5462</td>
<td>Finch, Van Slyck and McConville Dry Goods Company</td>
<td>360–366 Wacouta Street</td>
<td>Saint Paul</td>
<td>Listed; Lowertown: C</td>
</tr>
</tbody>
</table>

Historic properties are in the order they are presented in this report, which generally runs from south to north, except where properties are grouped, such as with the resources associated with the LS&M Railroad.

Historic properties are in the order they are presented in this report, which generally runs from south to north, except where properties are grouped, such as with the resources associated with the LS&M Railroad.

Historic properties are in the order they are presented in this report, which generally runs from south to north, except where properties are grouped, such as with the resources associated with the LS&M Railroad.

Within the National Register Status column, “Listed” or “Eligible” refers to the status of the individual resource. For individually listed or eligible resources that are also located within historic districts, “C” means the property is contributing to the district and “NC” means the property is noncontributing to the district.
<table>
<thead>
<tr>
<th>Inventory or Site Number</th>
<th>Property Name</th>
<th>Address</th>
<th>City</th>
<th>National Register Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-8364</td>
<td>Saint Paul Urban Renewal Historic District</td>
<td>Roughly between 6th Street, Kellogg Boulevard, Wabasha Street, and Jackson Street</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-3168</td>
<td>First Farmers and Merchants National Bank Building</td>
<td>332 Minnesota Street</td>
<td>Saint Paul</td>
<td>Eligible; Urban Renewal: NC</td>
</tr>
<tr>
<td>RA-SPC-4645</td>
<td>First National Bank of Saint Paul</td>
<td>332 Minnesota Street</td>
<td>Saint Paul</td>
<td>Eligible; Urban Renewal: NC</td>
</tr>
<tr>
<td>RA-SPC-3167 RA-SPC-3169 RA-SPC-5223 RA-SPC-6903</td>
<td>Pioneer and Endicott Buildings</td>
<td>322–350 North Robert Street, 141 East 4th Street, 142 East 5th Street</td>
<td>Saint Paul</td>
<td>Listed (RA-SPC-3167, 3169, and 5223); Eligible (RA-SPC-6903)</td>
</tr>
<tr>
<td>RA-SPC-3170</td>
<td>Manhattan Building (aka Empire Building)</td>
<td>360 North Robert Street</td>
<td>Saint Paul</td>
<td>Listed</td>
</tr>
<tr>
<td>RA-SPC-3171</td>
<td>Golden Rule Department Store Building</td>
<td>85–95 7th Place</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-3174</td>
<td>Foot, Schulze &amp; Company Building</td>
<td>500 North Robert Street</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-6330</td>
<td>Produce Exchange Building</td>
<td>523 Jackson Street</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-5918</td>
<td>Great Northern Railroad Corridor Historic District</td>
<td>Saint Paul to Minneapolis</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-4582</td>
<td>StPM&amp;M Railway Company Shops Historic District</td>
<td>Jackson Street and Pennsylvania Avenue</td>
<td>Saint Paul</td>
<td>Listed; Great Northern Railroad Corridor: C</td>
</tr>
<tr>
<td>RA-SPC-5618</td>
<td>Westminster Junction</td>
<td>Roughly bounded by the Lafayette Road Bridge, I-35E, a line approximately 1,300 feet south of the Cayuga Street Bridge, and a line approximately 400 feet southwest of the Cayuga Street/Phalen Boulevard intersection</td>
<td>Saint Paul</td>
<td>Eligible; Great Northern Railroad Corridor: C</td>
</tr>
<tr>
<td>Inventory or Site Number</td>
<td>Property Name</td>
<td>Address</td>
<td>City</td>
<td>National Register Status</td>
</tr>
<tr>
<td>--------------------------</td>
<td>---------------</td>
<td>---------</td>
<td>------</td>
<td>--------------------------</td>
</tr>
<tr>
<td>XX-RRD-CNW001</td>
<td>StPS&amp;TF/Omaha Road Railroad Corridor Historic District</td>
<td>Saint Paul to Stillwater Junction Segment</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>XX-RRD-NPR001</td>
<td>LS&amp;M Railroad Corridor Historic District</td>
<td>Saint Paul to White Bear Lake Segment</td>
<td>Saint Paul, Maplewood, Vadnais Heights and White Bear Lake</td>
<td>Eligible</td>
</tr>
<tr>
<td>XX-RRD-NPR004</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Eldridge Avenue East and County Road B East</td>
<td>Maplewood</td>
<td>Eligible LS&amp;M Railroad Corridor Historic District: C</td>
</tr>
<tr>
<td>XX-RRD-NPR003</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Gervais Avenue and County Road C</td>
<td>Maplewood</td>
<td>Eligible LS&amp;M Railroad Corridor Historic District: C</td>
</tr>
<tr>
<td>XX-RRD-NPR002</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Kohlman and Beam Avenues</td>
<td>Maplewood</td>
<td>Eligible LS&amp;M Railroad Corridor Historic District: C</td>
</tr>
<tr>
<td>XX-RRD-NPR005</td>
<td>LS&amp;M Railroad Corridor Historic District</td>
<td>White Bear Lake to Hugo Segment</td>
<td>White Bear Lake</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-2926</td>
<td>Theodore Hamm Brewing Company Complex</td>
<td>Minnehaha Avenue East between Payne Avenue &amp; Stroh Drive</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-0455</td>
<td>3M Administration Building (3M Main Plant, Building 21)</td>
<td>777 Forest Street</td>
<td>Saint Paul</td>
<td>Listed</td>
</tr>
<tr>
<td>RA-SPC-10850</td>
<td>Phalen Park</td>
<td>1600 Phalen Drive</td>
<td>Saint Paul</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-SPC-8497 RA-SPC-5685</td>
<td>Johnson Parkway</td>
<td>Johnson Parkway from Indian Mounds Park to Lake Phalen</td>
<td>Saint Paul</td>
<td>Treated as Eligible</td>
</tr>
<tr>
<td>Site 21RA70</td>
<td>Gladstone Shops (Gladstone Savanna Neighborhood Preserve)</td>
<td>Southwest corner of Frost Avenue and English Street</td>
<td>Maplewood</td>
<td>Treated as Eligible</td>
</tr>
<tr>
<td>RA-MWC-0134</td>
<td>Moose Lodge 963</td>
<td>1946 English Street North</td>
<td>Maplewood</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-MWC-0106</td>
<td>Madeline L. Weaver Elementary School</td>
<td>2135 Binghamton Street</td>
<td>Maplewood</td>
<td>Eligible</td>
</tr>
<tr>
<td>RA-WBC-0031</td>
<td>Polar Chevrolet Bear/Paul R. Bear</td>
<td>1801 County Road F East</td>
<td>White Bear Lake</td>
<td>Eligible</td>
</tr>
</tbody>
</table>
This page intentionally left blank
Section 5: Assessment of Effects

Assessing Effects on Historic Properties

The criteria used to assess effects of Federal undertakings on historic properties are set forth in 36 CFR Part 800.5(a)(1):

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

An adverse effect can occur if any aspect of a historic property’s integrity is diminished. Examples of adverse effects are identified in 36 CFR Part 800.5(a)(2) and include, but are not limited to:

- Physical destruction of or damage to all or part of the property;
- Alteration of a property that is not consistent with the Secretary of the Interior’s Standards for the Treatment of Historic Properties (SOI Standards; 36 CFR Part 68) and applicable guidelines;
- Removal of the property from its historic location;
- Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features;
- Neglect of a property that causes its deterioration; and
- Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

An undertaking may have an effect on a historic property, but this does not necessarily constitute an adverse effect. For example, Project elements may be visible from a historic property without the effect rising to the level of an adverse effect. In this example, factors to consider when assessing whether the visual effect is adverse include proximity of Project components to the historic property, the nature of the Project element being introduced to the setting, the significance of the views to and from the historic property, and the overall importance of integrity of setting to the historic property’s ability to convey its significance and maintain its eligibility for inclusion in the National Register.
Project Documentation

The effects assessments below are based on the Project’s 15% Plans dated August 7, 2020, and the most recent draft text prepared for the Environmental Assessment dated September 2020, including the following supporting technical materials:


Effects Assessment

MnDOT CRU staff meeting the Secretary of the Interior’s Professional Qualification Standards (48 FR 44738-44739) in archaeology, architectural history, historic architecture, and history reviewed the above-referenced Project documentation and prepared effects assessments for each historic property within the APE. Analysis considered physical; visual; atmospheric; noise and vibration; traffic, access, and parking; cumulative; and indirect effects. Through its analysis, MnDOT CRU identified potential effects that are common throughout the corridor and not particular to specific historic properties; these General Project Effects are presented first. Analysis also identified potential effects that are specific to individual historic properties based on Project elements in particular locations. The individual historic property assessments are organized generally from south to north along the Project corridor, with individual properties that are also in historic districts included within the assessment for the district. Please note that because the architectural design for individual shelters, bridges, and the Highway 36

---

18 Because this assessment of effects is being prepared concurrently with the draft Environmental Assessment, page numbers, tables, and illustrations cited throughout this report may differ slightly from the final versions, which will be published in the coming months.
park-and-ride is not known, it is not accounted for in the effects assessments below. As design development progresses, FTA will assess the need to adjust the Project APE and/or the finding of effect for any historic properties.

General Project Effects

Physical
The proposed Project could physically affect several historic properties and unintentionally damage historic properties depending on where the proposed LOD for construction falls in relation to historic property boundaries. Due to the unique nature of these potential physical effects, individual property assessments, below, discuss potential physical effects. In some cases, construction protection measures are recommended to minimize or avoid unintended damage to historic properties during construction. These measures would be incorporated into a Construction Protection Plan for Historic Properties (CPPHP) as part of construction documents.

Visual
The proposed Project would visually affect several historic properties. Due to the unique nature of these visual effects, individual property assessments, below, discuss potential physical effects.

Atmospheric
New transportation systems have the potential to result in increased air pollutant emissions in proximity to historic properties. Project documentation, however, confirms BRT operations using all-electric, zero-emission buses would result in no exceedances of air pollutant concentrations.\(^{19}\) Further, although exceedances of air pollutant concentrations from construction equipment or disturbed soils are not anticipated during Project construction, the Project is prepared to implement Environmental Protection Agency-recommended measures to avoid or reduce impacts on air quality where necessary. These avoidance and mitigation measures range from minimizing ground disturbance during construction to revegetating disturbed land following construction.\(^{20}\) No adverse effects due to atmospheric changes are anticipated within the APE.

Noise & Vibration
The Project has identified several historic properties as having noise-sensitive land uses; these include the St. Paul, Minneapolis, and Manitoba (StPM&M) Railway Company Shops Historic District (occupied by the Minnesota Transportation Museum), the Urban Renewal Historic District (including Twin Cities PBS and residential buildings), and Lowertown Historic District (residential buildings).\(^{21}\) Despite the identification of noise-sensitive land uses in historic properties, no adverse effects are anticipated from either noise or vibration during the operational phase of the BRT. Project documentation confirms that the Project would “add a negligible amount of noise” that would not exceed noise impact criteria.\(^{22}\) The Project does not meet FTA guidelines for conducting vibration screening due to the use of rubber-tired vehicles, newly paved dedicated BRT guideways and dedicated BAT lanes, and the shared use of existing traffic lanes.\(^{23}\)

Temporary noise and vibration during construction is anticipated and was considered as part of APE development. In addition to typical construction noise from equipment and construction activities, pile driving may be used for elevated structures and retaining walls. Project documentation notes that a “quantitative assessment of construction noise and vibration impacts will be conducted as engineering advances when detailed construction scenarios are available.” Project documentation also notes that in residential areas, the impact from construction noise can extend to 120 feet during the day and 380 feet at night, while impact pile driving has a noise impact of up to 250 feet. The potential for damage from construction vibration can extend to 25 feet from construction sites, with potential damage from impact pile driving extending to 55 feet. According to the Noise and Vibration Technical Report, there “are no [vibration] sensitive receivers within 25 feet of the project corridor in areas where construction would occur, and there are no receivers within 55 feet of locations where pile driving would occur.”

Based on current Project documentation, no historic properties will be subject to construction noise or vibration in a manner that would constitute an adverse effect; however, as Project plans progress, FTA will continue to assess the need to adjust the finding of effect for any historic properties based on anticipated noise and vibration during construction. Any potential adverse effects due to construction noise and vibration can typically be avoided through the preparation and implementation of a CPPHP that includes a Noise Mitigation Plan and/or Vibration Management and Remediation Measures.

Traffic, Access, and Parking

In general, no adverse effects are anticipated from temporary or permanent changes in traffic, access, or parking. However, the proposed Project would have minor permanent effects, including land acquisition and changes to traffic, near historic properties. Due to the unique nature of these effects, individual property assessments will discuss potential permanent effects.

Traffic analysis included Project areas “impacted by changes to roadway geometry or traffic control.” Project documentation notes that for the majority of downtown Saint Paul, BRT buses running in mixed traffic would result in “only a 1 to 2 percent change in traffic volumes” and “traffic impacts are not expected.” For the remainder of the traffic analysis’s study area, beginning with Robert Street in Saint Paul and extending to White Bear Lake, Project documents outline locations on Robert Street, Phalen Boulevard, Neid Lane, and Highway 61 where queuing issues have been identified. For intersections with queuing issues, the Project developed recommended mitigation measures, including diversion to alternative routes, extending or restriping turn lanes, and adjusting signal timing and priority parameters. These mitigation measures will be incorporated into the Project pending approval by the appropriate roadway authority.

The Project is generally anticipated to “improve” or “enhance” access to community facilities, including historic properties like Phalen Park and Weaver Elementary School near stations in Saint Paul, Maplewood, Vadnais Heights, and White Bear Lake. The Project is anticipated to have no impacts to community facilities near stations in White Bear Township and Gem Lake.

---

Although parking spaces would be permanently lost in Saint Paul, Maplewood, and White Bear Lake, Project documentation indicates the losses would not have adverse impacts due to alternative parking options. Parking options would increase in Vadnais Heights through the construction of an at-grade park-and-ride (a shared-use facility), serving the County Road E Station. Another park-and-ride is also an option being considered near Harvest Park in Maplewood and would increase parking options.

During construction, the Project would temporarily affect traffic, access, and parking. Temporary construction easements would also be needed for construction staging. Traffic impacts may include lane, intersection, and roadway closures and detours, possibly increasing congestion in local areas for short periods of time. In addition, construction may also require the temporary loss of some on-street parking. However, the Project is developing a detailed construction staging plan, including phasing, signage, detours, and communications with residents and business owners, to minimize construction impacts. Therefore, no adverse effects are anticipated due to changes in traffic, access, and parking during construction.

Cumulative
The Project has identified a number of projects either underway or proposed by others that “could compound anticipated impacts and contribute to cumulative effects” and has concluded that “the combined project-related impacts are not anticipated to require avoidance, minimization or mitigation measures other than those identified in the EA.”

Individual property assessments discuss any potential for cumulative effects to historic properties in relation to the particular type of effect (e.g., physical, visual, traffic, etc.). Each assessment pays particular attention to undertakings being coordinated with the Rush Line BRT Project. For example, with the exception of the 10th Street Station and Union Depot Station, construction in downtown Saint Paul is being completed under the METRO Gold Line BRT Project and, therefore, the potential for physical effects is handled under that project’s assessment of effects. However, the increased and cumulative effects of bus traffic due to the Rush Line BRT is discussed in the individual assessments. No adverse effects are anticipated due to the cumulative bus traffic.

Indirect
The Project anticipates new transit-oriented development (TOD) near the station areas, which has the potential to cause indirect, visual effects to historic properties. Project-induced TOD can only occur in accordance with local planning efforts and is generally considered to benefit municipalities “by helping them achieve their long-range land use and transportation goals.”

In-depth station area planning is proposed to begin in the coming months. In order to minimize the potential for adverse indirect effects due to TOD, station area planning for the following stations will consider nearby historic properties:

- 10th Street Station: Foot, Schulze & Company Building, Produce Exchange Building
- Olive Street Station: Great Northern Railroad Corridor, Westminster Junction

---

30 SRF Consulting Group, Inc., “Land Use and Economics Technical Report, Draft,” Section 4.4. Project documents note differences in Maplewood depending on the option chosen for the parking facility at the Highway 36 Station; however, neither option is anticipated to result in adverse effects to community facilities, character, or cohesion.


Cayuga Street Station: Great Northern Railroad Corridor, Westminster Junction, StPS&TF/Omaha Road Railroad Corridor Historic District
• Payne Avenue Station: StPS&TF/Omaha Road Railroad Corridor Historic District, Theodore Hamm Brewing Company Complex
• Arcade Street Station: StPS&TF/Omaha Road Railroad Corridor Historic District, Theodore Hamm Brewing Company Complex; 3M Administration Building
• Cook Avenue Station: Johnson Parkway, LS&M Railroad Corridor Historic District
• Maryland Avenue Station: Phalen Park, Johnson Parkway, LS&M Railroad Corridor Historic District
• Larpenteur Avenue Station: LS&M Railroad Corridor Historic District
• Frost Avenue Station: LS&M Railroad Corridor Historic District, Site 21RA70, Moose Lodge 963
• Highway 36 Station: LS&M Railroad Corridor Historic District
• Buerkle Road Station: LS&M Railroad Corridor Historic District
• Whitaker Street Station: LS&M Railroad Corridor Historic District

If any Station Area Plans are formally adopted by local municipalities, FTA will assess the need to adjust the Project APE and/or the finding of effect for any historic properties.

East Metro Garage Charging Stations

North of the project corridor in Saint Paul, electric charging stations are proposed to be added to the interior of the East Metro Garage, an existing Metro Transit operations and maintenance facility built in 2001 (see Sheets 7 and 33 of the 15% Plans). The changes to the interior of this modern facility have no potential to affect any of the identified historic properties.

Properties Associated with the Lowertown Historic District

A number of resources associated with the Lowertown Historic District in downtown Saint Paul are located within the Project APE (see Table 3). Due to the close historical associations and physical proximity of the properties within the historic district, potential Project effects are assessed collectively.

Table 3. Lowertown Historic District Resources in the Project APE

<table>
<thead>
<tr>
<th>Inventory No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-3351</td>
<td>Smith Park (Mears Park)</td>
<td>220 East 6th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-3352</td>
<td>Gordon and Ferguson Building</td>
<td>331–341 Sibley Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-3353</td>
<td>John Wann Building</td>
<td>350–364 Sibley Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-4519</td>
<td>Commercial Building/Depot Bar</td>
<td>241 Kellogg Boulevard East, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-4520</td>
<td>Weyerhauser-Denkman Building</td>
<td>255 Kellogg Boulevard East, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-4521</td>
<td>Wells Fargo Express Company Building</td>
<td>271 Kellogg Boulevard East, Saint Paul</td>
<td>C</td>
</tr>
</tbody>
</table>

34 The construction of this facility resulted in No Adverse Effect to Westminster Junction; see SHPO No. 1999-1621.
<table>
<thead>
<tr>
<th>Inventory No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-4522</td>
<td>James J. Hill Office Building</td>
<td>281–299 Kellogg Boulevard East, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-4523</td>
<td>Griggs and Foster's Farwell, Ozmun and Kirk Building</td>
<td>319 Kellogg Boulevard East, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5224</td>
<td>Samco Sportswear Company</td>
<td>205–213 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5225, RA-SPC-6907</td>
<td>Saint Paul Union Depot</td>
<td>214 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5226</td>
<td>Michaud Brothers Building</td>
<td>249–253 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5227</td>
<td>Hackett Block</td>
<td>262–270 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5228</td>
<td>Chicago, St. Paul, Minneapolis and Omaha Railroad Office Building</td>
<td>275 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5246</td>
<td>Railroad and Bank Building (Burlington Northern)</td>
<td>176 East 5th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5248</td>
<td>Fairbanks-Morse Company</td>
<td>220 East 5th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5249</td>
<td>Powers Dry Goods Company</td>
<td>230–236 East 5th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5250</td>
<td>Conrad Gotzian Shoe Company Building</td>
<td>242–280 East 4th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5251</td>
<td>Mike and Vic's Café/Commercial Building/Carriage Warehouse</td>
<td>258–260 East 5th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5461</td>
<td>Paul Gotzian Building</td>
<td>352 Wacouta Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5462</td>
<td>Finch, Van Slyck and McConville Dry Goods Company</td>
<td>360–366 Wacouta Street, Saint Paul</td>
<td>C</td>
</tr>
</tbody>
</table>

The following resources within the Lowertown Historic District and the Project APE are also individually listed in the National Register:

- Saint Paul Union Depot (RA-SPC-5225, RA-SPC-6907)
- Finch, Van Slyck and McConville Dry Goods Company (RA-SPC-5462)

Information specific to these historic properties is further discussed below.
Description & Historic Significance
Lowertown Historic District (RA-SPC-4580)
Roughly bounded by Shepard Road, Kellogg Boulevard, Broadway Street, 7th Street, and Sibley Street, Saint Paul

The Lowertown Historic District covers 16 blocks located on the eastern edge of downtown Saint Paul, north of the Mississippi River. The district, which is roughly bounded by Shepard Road, Kellogg Boulevard, Broadway Street, 7th Place East, and Sibley Streets, contains primarily late 19th- and early 20th-century warehouses and wholesale buildings constructed for railroad-related businesses (Figure 3). The commercial buildings serve a utilitarian function, but were often designed by prominent architects to convey the prominent styles of the time, including Italianate, Queen Anne, Richardsonian Romanesque, Beaux Arts, and Classical Revival. Properties are built up to the right-of-way and abut adjacent buildings on the street-facing side, with gaps only for rear alley access.

Figure 3. 6th Street to the north of Mears Park, showing a representative example of Lowertown Historic District’s architectural character and streetscape.

The Lowertown Historic District was listed in the National Register in 1983 and is significant under Criterion A in the areas of Commerce, Industry, and Transportation for being the site of a major railroad hub and the location of Saint Paul’s warehouse and wholesaling district during the late 19th and early 20th centuries. Lowertown is also significant under Criterion C in the areas of:

- Architecture, for its collection of commercial buildings, many designed by nationally recognized architects;

---

Community Planning, for the grid street platting and design and grade changes made to accommodate the needs of the growing warehousing area, and for the placement of Mears (formerly Smith) Park; and

Landscape Architecture for Mears (Smith) Park which has been maintained since the block’s conversion to a park in the 1870s.  

The historic district’s period of significance extends from 1870 to 1923, the construction dates of the earliest and last contributing resources within the district, respectively. Overall, the Lowertown Historic District retains good integrity of workmanship, design, materials, location, association, and feeling. Character-defining features include the design of the contributing properties, which have simple block massing with a variety of applied styles; a grid street pattern; sloping topography toward the river; and Mears (formerly Smith) Park as the nucleus and visual center—all “dramatic street patterns and grade changes which were made in the 1870s.” While the roadways and sidewalks provide a physical framework for the historic district, they have been rebuilt or reconstructed numerous times since the end of the period of significance and no longer maintain integrity of material, design, or workmanship.

Lowertown was designated a City of St. Paul Local Heritage Preservation District in 1984; however, the Lowertown Heritage Preservation District has a different boundary than the National Register-listed Lowertown Historic District.

**Saint Paul Union Depot (RA-SPC-5225, RA-SPC-6907)**

214 East 4th Street, Saint Paul

Constructed between 1917 and 1926 at the southern edge of downtown St. Paul and overlooking the Mississippi River, the Saint Paul Union Depot (Union Depot) is a five (5)-story, limestone-clad, Neoclassical style railroad depot that is now a multimodal facility (Figure 4). The property includes a semi-circular front approach and lawn, headhouse, concourse, waiting room, stair tower, Kellogg entry addition (2012), train and bus deck, parking garage, and train yard (Figure 5). Union Depot was designed by architect Charles Sumner Frost, who was prolific in railroad station and depot design.

---


39 The Lowertown Heritage Preservation District has three (3) additional blocks on the west side of Sibley Street between 7th Place East and Kellogg Boulevard East, as seen in online mapping at the City of Saint Paul website https://www.stpaul.gov/departments/planning-economic-development/heritage-preservation/historic-districts-and-individual (accessed July 30, 2020).

Figure 4. Union Depot, facing east-northeast.

Figure 5. Union Depot components.  

Union Depot was originally listed in the National Register in 1974 and the boundary was increased in 2014. The property has statewide significance under Criterion A in the areas of Transportation, Commerce, and Industry and under Criterion C in the areas of Architecture and Engineering. In the areas of Transportation, Commerce and Industry, Union Depot characterizes St. Paul’s early 20th-century

---

buildings which reflected the importance of railroad transportation in the early growth, expansion, and prosperity of the quickly growing commercial center. In the area of Architecture, Union Depot is significant for its use of the Neoclassical style, which was prevalent in public and governmental buildings between the World Wars. In the area of Engineering, Union Depot is significant for the construction of the train deck and yards. The period of significance extends from 1917, the year construction began, to 1963 when Union Depot’s use as a transportation hub and passenger depot declined. Union Depot retains good integrity of workmanship, design, materials, location, association, setting, and feeling.

Character-defining features of Union Depot include the Neoclassical design elements, vaulted interior passenger concourse, a semi-circular front approach, train deck, elevated rail yards, connection to the rail yards, and significant grading and placement on sloping topography toward the Mississippi River. Another character-defining feature is the setting and prominent placement of Union Depot within the Lowertown neighborhood, illustrating the relationship of Union Depot to St. Paul as a vibrant commercial center in the early 20th century. The 2014 boundary increase describes specific parts of the building, including those that are integral to assessing the Project’s potential effects on the historic property:

- **Train deck:** The elevated train deck originally contained railroad tracks on the deck level with support operations below. It received numerous repairs and new features as part of its conversion to multimodal transit and transportation use in 2012.
- **Historic stair tower:** The lower level (deck) and canopy of the historic stair tower are original. The upper level, attached to the waiting room, was built in 2012 to closely resemble the original. This character-defining feature is used for historic interpretation of Union Depot’s development.

Union Depot contributes to the Lowertown Historic District, discussed above. It is also located within the boundaries of the locally designated Lowertown Heritage Preservation District.

**Finch, Van Slyck, and McConville Dry Goods Company (RA-SPC-5462)**

360-366 Wacouta Street, Saint Paul

The Finch, VanSlyck, and McConville Dry Goods Company (Finch) Building is an eight (8)-story, Neoclassical style warehouse building with a C.A.P. Turner-designed internal structure of reinforced concrete (Figure 6). The building is bounded by 5th and 6th Streets to the south and north respectively, and fronts on to Wacouta Street to the west. It is surrounded primarily by warehouse and commercial buildings of comparable size and massing, and faces Mears (originally Smith) Park. Constructed in 1911 following the design of James F. Denson, the historic property has exterior walls clad in buff-colored brick. An eight (8)-floor shipping annex extending between the Finch Building’s rear (northeast) façade and Wall (originally Rosabel) Street was constructed by 1916. In 1923, architect Clarence Johnston, Jr. designed two (2) bays for the northwest façade.

---


The Finch Building was listed in the National Register in 1982 and is significant under Criterion A in the area of Commerce for its association with its namesake company. It is also significant under Criterion C in the area of Engineering for Turner’s cutting-edge use of reinforced concrete, flat slabs, and mushroom-capped columns to support the weight of the dry goods and protect them from fire and other damage. The period of significance starts with the building’s construction in 1911 and ends in 1923 with the completion of the Johnston addition. Character-defining features include its exterior decorative Neoclassical elements and design, including the regular progression of bays, formal entries and pilaster arrangements on the Wacouta and 5th Street façades, segmental arches at the seventh story, and a projecting cornice; and its internal reinforced concrete structure. The building’s adjacency to and orientation towards Mears Park is an important feature of its setting.

The Finch Building contributes to the Lowertown Historic District, discussed above. It is also within the boundaries of the locally designated Lowertown Heritage Preservation District.

**Potential Effects**

The proposed Rush Line BRT Project includes operation of BRT vehicles within the Lowertown Historic District and construction at the Union Depot Station / Union Depot Bus Deck Platform (see Sheets 4, 5, and 32 of the 15% Plans and Figure 7). From the north, BRT vehicles would enter the historic district along 5th Street at Jackson Street and then travel down Wacouta Street and Kellogg Boulevard East to the Union Depot bus deck. From the south, BRT vehicles would travel from the Union Depot bus deck along Kellogg Boulevard East and Sibley Street to exit the District’s boundaries as buses turn onto 6th Street. As noted on the 15% Plans, other new BRT elements within the Lowertown Historic District and shared by the Rush Line BRT Project are proposed for construction under the METRO Gold Line BRT Project. These include the construction of the Union Depot Station / Sibley Street Platform at the northeast corner of East 4th and Sibley Streets and the Union Depot Station / Wacouta Street Platform at the northwest corner of East 4th and Wacouta Streets, as well as street reconstruction, curb and sidewalk removal, and the placement of new infrastructure such as signage and signaling. Temporary and permanent physical, visual, and other potential Project effects due to the construction of those BRT
elements are assessed under the Gold Line Project. Therefore, in addition to the potential physical and visual effect to Union Depot and Lowertown Historic District due to the construction at Union Depot, potential Rush Line BRT Project effects include potential changes in traffic, access, and parking.

Figure 7. Proposed Project plans within the vicinity of historic resources associated with the Lowertown Historic District (the district is outlined in blue and the individual resources in yellow).

---

44 Minnesota Department of Transportation, METRO Gold Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties, draft text as of September 2020.
Assessment of Effects

Physical
The proposed Rush Line BRT Project would not physically affect the Finch Building; however, it would have a direct, physical effect to Union Depot and, by association, the Lowertown Historic District. The infrastructure proposed as part of the Rush Line BRT Project falls within areas of both Primary and Secondary significance and the Rehabilitation Zone, as defined within the Union Depot Historic Structures Report. That document recommends that any “[n]ew interventions respect the rhythm of the structural grid.”

In addition to proposed modifications to the existing bus platform, a bus charging station consisting of an overhead charger, transformer, switchboard service cabinet, and ground cabinet would be built on the train deck. Because the Project elements are proposed for an area previously modified for use as a bus station, any potential physical or visual effects can be minimized and/or avoided through design development that ensures the new features blend with the design of the existing bus station infrastructure. In addition to considering the size, materials, and design character of the Project elements, design development should consider the design guidance found within the Guidelines for Design Review for the Lowertown Heritage Preservation District and the Union Depot Historic Structures Report.

Visual
Project elements proposed under the Rush Line BRT Project would not be visible from the Finch Building. Depending on its size, the bus charging station might be minimally visible from the corner of Kellogg Boulevard East and Sibley Street, at the edge of the Lowertown Historic District. Both the platform and the bus charging station would be visible from the historic stair tower, an important feature located within the historic property boundaries of Union Depot. However, because the Project elements are proposed for an area previously modified for use as a bus station, any potential physical or visual effects can be minimized and/or avoided through design development that ensures the new features blend with the design of the existing bus station infrastructure.

Traffic, Access, and Parking
As noted in the “General Project Effects” section, in-depth traffic analysis was not performed in this area because BRT buses would run in mixed traffic and result in only a 1 to 2% change in traffic volumes. This increase is above those expected under the METRO Gold Line BRT Project, which identified just 1.1 and 1.3% increases on 6th and 5th Street, respectively. These negligible increases in traffic would not impact important spatial relationships between contributing resources in the Lowertown Historic District and, because no changes would be made to street alignments, the historic rectilinear grid pattern, circulation patterns, and general access to historic properties would be preserved. The Project would not result in the loss of any on-street parking spaces within the Lowertown Historic District. Thus, the parking needs within the district or at contributing resources would not be impacted.

45 Ramsey County Regional Railroad Authority, Union Depot, St. Paul, Minnesota: Historic Structures Report, 150.
**Recommended Finding**

**Finch, Van Slyck and McConville Dry Goods Company Building: No Adverse Effect**
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect to the Finch, Van Slyck and McConville Dry Goods Company Building**. The historic property would not be physically affected by the Project, nor would any Project elements be visible from the historic property. The negligible increase in bus traffic proposed in the vicinity of the historic property due to the Rush Line BRT Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

**Saint Paul Union Depot and Lowertown Historic District: No Adverse Effect with Conditions**
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on the Saint Paul Union Depot and the Lowertown Historic District, if certain conditions are placed on the Project**. Although construction of the Project would physically and visually affect Union Depot, the proposed alterations would complement Union Depot’s use as a multimodal facility. The proposed conditions ensure the Project would not alter any of the characteristics that qualify Saint Paul Union Depot or the Lowertown Historic District for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association. The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

- As part of design development, Project elements will be blended visually and materially into the existing modern bus station infrastructure within the portion of the train deck previously modified.

**Properties Associated with the Urban Renewal Historic District**
A number of resources associated with the Urban Renewal Historic District in downtown Saint Paul are located within the Project APE (see Table 4). Due to the close historical associations and physical proximity of the properties within the historic district, potential Project effects are assessed collectively.

**Table 4. Urban Renewal Historic District Resources in the Project APE**

<table>
<thead>
<tr>
<th>Inventory No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>n/a</td>
<td>Skyway Bridge 22/Bridge No. 95272</td>
<td>Robert Street, between 5th and 6th Streets, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>n/a</td>
<td>Skyway Bridge 48</td>
<td>On block bounded by 6th, Jackson, 5th, and Robert Streets, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-3168</td>
<td>First Farmers and Merchants National Bank Building</td>
<td>339 North Robert Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-4645</td>
<td>First National Bank of Saint Paul</td>
<td>332 Minnesota Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-6901</td>
<td>Farm Credit Banks Building</td>
<td>375 Jackson Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-6902, RA-SPC-8105</td>
<td>Minnesota Dept. of Economic Security Building</td>
<td>390 North Robert Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>Inventory No.</td>
<td>Property Name</td>
<td>Address</td>
<td>Status</td>
</tr>
<tr>
<td>--------------</td>
<td>---------------</td>
<td>---------</td>
<td>--------</td>
</tr>
<tr>
<td>RA-SPC-8103</td>
<td>American National Bank Building (U.S. Bank Center)</td>
<td>101 East 5th Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-8104</td>
<td>First National Bank Addition</td>
<td>332 Minnesota Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-8106</td>
<td>Block F Plaza</td>
<td>375 North Robert Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-8107</td>
<td>Twin City Federal Savings and Loan Building (The Buttery)</td>
<td>395 North Robert Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-8109</td>
<td>Farm Credit Banks Building Addition (1979)</td>
<td>135 East 5th Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-9043</td>
<td>Skyway Bridge 30/Bridge No. 92716</td>
<td>Robert Street, between 4th and 5th Streets, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-9045</td>
<td>Skyway Bridge 25/Bridge No. 91249</td>
<td>5th Street, between Minnesota and Robert Streets, Saint Paul</td>
<td>C</td>
</tr>
</tbody>
</table>

The following noncontributing resources within the Urban Renewal Historic District are eligible for inclusion in the National Register as individual resources:

- First National Bank of Saint Paul (RA-SPC-4645)
- First Farmers and Merchants National Bank Building (RA-SPC-3168)

Information specific to these historic properties is further discussed below.

**Description & Historic Significance**

**Saint Paul Urban Renewal Historic District (RA-SPC-8364)**

Roughly bounded by 6th Street, Kellogg Boulevard, Wabasha Street, and Jackson Street, Saint Paul

The Saint Paul Urban Renewal Historic District represents efforts to transform the city’s downtown commercial core between 1955 and 1974 (Figure 8). In Saint Paul, the first phase of the downtown urban renewal from 1955 to 1966 was driven by private businesses such as Dayton’s Department Store and the Saint Paul Hilton Hotel. The second phase from 1967 to 1974 was driven by federal funds for the development of a 12-block Capital Centre. The district reflects the nationwide trend to redevelop and revitalize city central business districts in the years following World War II. Many contributing buildings are designed in the International Style with monolithic building units including “metal beams, glass curtainwalls, precast concrete systems, stone veneers forming large-scale, repetitive grids that reflect industrial production rather than individual craftsmanship.” The buildings have recessed ground-level floors that create protected walkways and public plazas incorporated within the building parcels.

---

The Saint Paul Urban Renewal Historic District is eligible for inclusion in the National Register under Criterion A for its local significance in Community Planning and Development. The period of significance for the historic district extends from 1955 to 1974 and has two (2) phases, 1955–1966 (Early Urban Renewal Phase) and 1967–1974 (Capital Centre Phase). New building construction and the removal of all original benches, bus shelters, light standards, traffic signals, trash cans and concrete planters have diminished the District’s integrity of materials, design, and workmanship. While the roadways and sidewalks provide a physical framework for the historic district, they have been rebuilt or reconstructed numerous times since the end of the period of significance and no longer maintain integrity of material, design, or workmanship.\textsuperscript{50} Although the integrity of design, materials, and workmanship is intermittently compromised, sufficient integrity of the district remains to convey its historic significance. Character-defining features of the district include the buildings designed in the monolithic International Style, spatial organization, topography, vegetation, circulation features (streets and skyway bridges), and water features.

\textsuperscript{50} Roise, Rempfert, and Goetz, \textit{Reevaluation of Urban Renewal Historic District}, 72.
First Farmers and Merchants National Bank Building (RA-SPC-3168)
First National Bank of Saint Paul (RA-SPC-4645)
332 Minnesota Street, Saint Paul

The First Farmers and Merchants National Bank Building / First National Bank of Saint Paul (First National Bank) is comprised of three (3) buildings and one (1) structure that occupy the block bounded by 4th, Robert, 5th, and Minnesota Streets in downtown Saint Paul. The First Farmers and Merchants Bank Building (RA-SPC-3168), commonly referred to as the East Tower, is a 16-story, Classical Revival style office building with a tripartite form designed by prominent Chicago architect Jarvis Hunt and constructed in 1916 on the western corner of the intersection of 4th and Robert Streets (Figure 9). In 1929, Merchants National Bank merged with First National Bank, eventually leading to the construction of the neighboring building. The First National Bank Building of St. Paul (RA-SPC-4645), often referred to as the West Tower, is a 32-story office tower constructed in 1931 on the northern corner of the intersection of 4th and Minnesota Streets (Figure 9). Designed in the Art Deco style (also described as Modern Classicism) by the nationally known Chicago architecture firm of Graham, Anderson, Probst and White, the upper floors are stepped back from the lot line and the building is crowned by a three (3)-sided, 150-foot tall, illuminated “1st” sign (structure) that is a defining feature of the Saint Paul skyline. A third building, the First Bank Addition (RA-SPC-8104), occupies the northwestern half of the block, facing 5th Street (Figure 10). Designed by Haarstick, Lundgreen and Associates, this limestone-clad, International Style building was completed in 1969 and features retail space on the first and second stories with seven (7) levels of parking above.

51 Information on the First Farmers and Merchants National Bank Building and the First National Bank of Saint Paul comes from “First National Bank of Saint Paul” Historic Preservation Certification Application; Brita Bloomberg, MnSHPO, letter to Richard Rossi, August 25, 2006, available in First National Bank property file, State Historic Preservation Office, Saint Paul. While previous documentation on these three (3) resources confirm their historical association with each other and uses terminology reserved for historic districts, no determination of eligibility has been made for a historic district or for this block of buildings as a complex. Due to the minor scale and scope of this undertaking near the subject property, evaluating the buildings as a district or a complex was not warranted to assess effects.

52 Previous documentation for this property also notes a construction date of 1915.

53 Previous documentation for this property also notes a construction date of 1971.
Figure 9. First National Bank Building of St. Paul (West Tower, on left) and First Farmers and Merchants Bank Building (East Tower, on right), facing northeast.

Figure 10. First Bank Addition (on left) and First National Bank Building of St. Paul (West Tower, on right), facing east.
The First Farmers and Merchants Bank Building (East Tower) is individually eligible for inclusion in the National Register under Criterion A in the area of Commerce as one of Saint Paul’s earliest and most important financial institutions. It is also eligible under Criterion C in the area of Architecture as a sophisticated example of a Beaux Arts office building.\textsuperscript{54} The property’s period of significance begins with its construction in 1916 and ends in 1968, when the bank relinquished its identity to its holding company. The First National Bank Building of St. Paul (West Tower) is individually eligible for inclusion in the National Register under Criterion A in the area of Commerce for its statewide significance as the headquarters of First National Bank, Saint Paul’s oldest, largest, and leading bank for much of the 19th and 20th centuries. The historic property was the city’s tallest building for over a half century. Both it and its “1\textsuperscript{st}” sign remain an iconic part of downtown Saint Paul’s skyline. The historic property is also individually eligible for inclusion in the National Register under Criterion C in the area of Architecture as an example of the Art Deco style and as the work of a master, the firm of Graham, Anderson, Probst and White. The property’s period of significance begins in 1931 when the First National Bank Building was placed into service and ends in 1968, when the bank relinquished its identity to its holding company. Both properties retain sufficient integrity to convey their significance.\textsuperscript{55} Character-defining features include the “1\textsuperscript{st}” sign; the architectural designs of both buildings; near zero lot lines; the emphasis on verticality; tall, narrow, slightly recessed window bays that visually connect between floors; and a base of polished black granite topped with light-colored masonry (brick or limestone).

Due to the dates of their construction, the First Farmers and Merchants National Bank Building (East Tower) and the First National Bank of Saint Paul (West Tower) are noncontributing resources within the Saint Paul Urban Renewal Historic District. Although the First National Bank Addition is not individually eligible for inclusion in the National Register, it contributes to the Urban Renewal Historic District.

\textbf{Potential Effects}

The proposed Rush Line BRT Project includes operation of BRT vehicles within the district and reconstruction of a sidewalk at the northwest corner of Robert Street and 6th Street (see Sheets 4 and 5 of the 15\% Plans and Figure 11). From the north, BRT vehicles would enter the district along Robert Street at 6th Street and then exit the District’s boundaries as buses turn off of Robert Street onto 5th Street, near the block containing this historic property. From the south, BRT vehicles would enter the district along 6th Street at Jackson Street and exit the District’s boundaries as buses turn onto North Robert Street. As noted on the 15\% Plans, other new BRT elements within or immediately adjacent to the Saint Paul Urban Renewal Historic District and shared by the Rush Line BRT Project are proposed for construction under the METRO Gold Line BRT Project. These include the construction of both the 5th and 6th Street Platforms of the 5th/6th Street Station, as well as street reconstruction, curb and sidewalk removal, and the placement of new infrastructure such as signage and signaling. Temporary and permanent physical, visual, and other potential Project effects due to the construction of those BRT


elements are assessed under the Gold Line Project. Therefore, in addition to the potential physical and visual effect to the Saint Paul Urban Renewal Historic District due to the reconstruction of the sidewalk, potential Rush Line BRT Project effects include changes in traffic, access, and parking.

Figure 11. Proposed Project plans within the vicinity of historic resources associated with the Urban Renewal Historic District (the district is outlined in purple and the individual resources in yellow).

Assessment of Effects

Physical

Although the proposed Project would have a direct, physical effect to the Saint Paul Urban Renewal Historic District, the effect would be minor. Within the historic property boundaries, a sidewalk is proposed for reconstruction at the northeast corner of 6th Street and Robert Street. Sidewalks and

---

curbs have been altered and replaced throughout the historic district and the proposed construction would affect modern materials within the road right-of-way. The nearest contributing resource, the Minnesota Department of Economic Security Building (RA-SPC-6902, RA-SPC-8105) is 65 feet across 6th Street, removed from any potential unintended damage from construction activities. Therefore, the sidewalk construction is not anticipated to diminish the integrity of design, materials, or workmanship of the historic district or any associated contributing resources.

**Visual**

With the exception of the sidewalk at the corner of 6th Street and Robert Street, Project elements constructed under the Rush Line BRT Project would not be visible from the Saint Paul Urban Renewal Historic District. The 10th Street Station is approximately 1,400 feet north of the northern boundary of the district and construction at Union Depot is 500 feet east of the southeast corner of the district.

**Traffic, Access, and Parking**

As noted in the “General Project Effects” section, in-depth traffic analysis was not performed in most of downtown Saint Paul because BRT buses would run in mixed traffic and result in only a 1 to 2% change in traffic volumes. This increase is above those expected under the METRO Gold Line BRT Project, which identified just 1.1 and 1.3% increases on 6th and 5th Street, respectively. Rush Line BRT traffic analysis did include Robert Street, beginning at 5th Street within the district boundaries. Potential queuing issues were identified along Robert Street at both 5th and 6th Streets, where northbound through and right-turn movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be minimized through diversion to alternative routes. Furthermore, the increases in traffic would not impact important spatial relationships between contributing resources in the Saint Paul Urban Renewal Historic District and, because no changes would be made to street alignments, the rectilinear grid pattern, historic spatial organization, topography, and circulation features would be preserved. The Project would not result in the loss of any on-street parking spaces within the Saint Paul Urban Renewal Historic District. To the north of the historic district, Robert Street would have a net loss of 32 parking spaces. However, Project documentation confirms that there are many other on- and off-street parking options in this area and that the loss of parking would not negatively impact community facilities, character, or cohesion. Thus, the parking needed for access to historic properties within the district would not be negatively impacted.

**Recommended Finding: No Adverse Effect**

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect to the Saint Paul Urban Renewal Historic District, the First Farmers and Merchants National Bank, and the First National Bank of Saint Paul. Although the Project would physically affect the historic district through the reconstruction of a small portion of a sidewalk, it would not alter any of the characteristics that qualify the historic district for inclusion in the National Register. No other Project elements would be visible from the historic properties. The negligible increase in bus traffic within and in the vicinity of the historic properties due to the Rush Line BRT Project would not alter any of the characteristics that

---

qualify them for inclusion in the National Register or diminish the historic properties’ integrity of location, design, setting, materials, workmanship, feeling, or association.

322 North Robert Street, 141 East 4th Street, and 142 East 5th Street, Saint Paul

Description & Historic Significance
Three buildings occupy a T-shaped site on the block bounded by 4th, Jackson, 5th, and Robert Streets in downtown Saint Paul (Figure 12, Figure 13, and Figure 14). The Pioneer Building and Endicott Buildings were built one (1) year apart from each other and are listed in the National Register as a single historic property (RA-SPC-5223). The Endicott Arcade Addition was built to connect to the Endicott Building, forming what is now considered a complex. Due to the close historical associations and physical proximity of the properties, potential Project effects are assessed collectively.

- The Pioneer Building (RA-SPC-3167) is a 16-story, Romanesque Revival style, masonry commercial building located on the northern corner of the intersection of 4th and Robert Streets (prior to 1909, it was known as the Pioneer Press Building). The original 12-story building was constructed in 1889 and designed by Chicago architect Solon Spencer Beman who employed a combination of the Richardsonian Romanesque and French Renaissance styles. The building has an iron structural system and the lower floors have 4.5-foot thick walls built from massive blocks of Rockville granite. The upper floors are faced with red pressed brick and red sandstone. Four (4) stories were added to the building in 1910. Also designed by Beman, the addition included a new decorative cornice with large scrolled brackets.

- The Endicott Building (RA-SPC-3169) is an L-shaped building constructed in 1890 that wraps around the Pioneer Building and faces onto both 4th and Robert Streets. The building is comprised of two (2) six (6)-story Italian Renaissance style towers, one (1) on each street, and linked by a one (1)-story arcade that extends through both towers. Designed by Saint Paul architect Cass Gilbert, the design promoted simplicity and balanced proportions. The Endicott Building has a granite base and a first story of red sandstone. The main archway on the 4th Street façade is flanked by granite piers topped by Tennessee marble capitals. The upper floors are faced with red brick, and window openings are ornamented with red sandstone. The Robert Street façade is also faced in red brick, with Tuscan columns constructed of polished Saint Cloud granite at the first floor, and carved red sandstone friezes between the upper floors.

- A one (1)-story addition, known as the Endicott Arcade Addition (RA-SPC-6903), was constructed in 1910 and fronts onto 5th Street. This building was designed by George H. Carsley with input from Cass Gilbert and features a series of storefronts and a main entrance offset to the east side of the façade.

---


61 The 4th Street tower was always known as the Endicott Building, but the Robert Street tower has also been referred to at various times as the Arcade Building, Endicott Arcade, the Endicott on Robert, and the Midwest Building.

Figure 12. Configuration of the Pioneer, Endicott, and Endicott Arcade Buildings. 63

Figure 13. Pioneer and Endicott Buildings, facing north.

Figure 14. The one-story Endicott Arcade Addition, facing southwest.
In 1974, the Pioneer and Endicott Buildings were listed in the National Register as a single property, and the Endicott Arcade Addition is eligible for inclusion in the National Register. Both the Pioneer and Endicott Buildings are significant under Criterion A in the area of Commerce for their role during the city’s late 19th-century commercial boom. The Pioneer Building is also significant under Criterion A in the area of Communications for housing the Twin Cities’ first documented commercial radio station in 1927. The three (3) buildings comprising the complex are significant under Criterion C in the area of Architecture as examples of the period’s changing commercial design and for their respective architectural styles. All of the buildings retain sufficient integrity to convey their significance. Character-defining features of the complex include the architectural design of the buildings, and tripartite forms of the towers, zero lot lines, prominent entrances, storefronts on the Robert Street elevation of the Endicott Building, and the 5th Street façade of the Endicott Arcade Addition.

**Potential Effects**

The proposed Rush Line BRT Project includes operation of BRT vehicles along 5th Street in front of the Endicott Arcade Addition (see Sheet 4 of the 15% Plans and Figure 15). The proposed 10th Street Station would be located 1950 feet north of the northern boundary of the property and construction at Union Depot would be located 580 feet east of the historic property. As noted on the 15% Plans, other new BRT elements within the historic property and shared by the Rush Line BRT Project are proposed for construction under the METRO Gold Line BRT Project. These include the construction of the 5th Street Platform, as well as street reconstruction, curb and sidewalk removal, and the placement of new infrastructure such as signage and signaling. Temporary and permanent physical, visual, and other potential Project effects due to the construction of those BRT elements are assessed under the Gold Line Project. Therefore, the primary potential Rush Line BRT Project effects on the historic property include changes in traffic, access, and parking.

---

64 The Pioneer Press and Endicott Buildings were built as separate properties and functioned as such for their first few decades of use. Since 1941, the buildings have been jointly operated and managed. Additionally, the wrap-around design of the Endicott Arcade as well as the city’s skyway system provides a physical connection. Therefore, their National Register nomination in 1974 considered them “as one inter-related interoffice business complex” (Thomas Lutz, National Register of Historic Places Inventory–Nomination Form prepared by the Minnesota Historical Society [May 29, 1974], Description.

65 Although this claim is made in the National Register nomination, other sources suggest KFOY was not the first commercial radio station in the Twin Cities; that claim might belong to WLAG, which started broadcasting in 1922 and later became WCCO. Millet, 81; “2,000 Crystal Set Owners Get Far Stations Through KFOY,” *Minneapolis Sunday Tribune*, May 11, 1924; “KFOY to Open 500 Watt Radio Station Monday,” *Minneapolis Sunday Tribune*, January 30, 1927; “Hotel’s Giant Radio to Open With Concert,” *Minneapolis Sunday Tribune*, September 3, 1922.

Figure 15. Proposed Project plans within the vicinity of the Pioneer and Endicott Buildings (outlined in blue) and the Manhattan Building (outlined in yellow).

Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect the Pioneer and Endicott Buildings. Therefore, the proposed Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
Neither the proposed 10th Street Station nor the proposed construction at Union Depot would be visible from the Pioneer and Endicott Buildings.

Traffic, Access, and Parking
As noted in the “General Project Effects” section, in-depth traffic analysis was not performed in most of downtown Saint Paul because BRT buses would run in mixed traffic and result in only a 1 to 2% change in traffic volumes. This increase is above those expected under the METRO Gold Line BRT Project, which identified just 1.1 and 1.3% increases on 6th and 5th Street, respectively. \(^{67}\) Rush Line BRT traffic analysis did include Robert Street, beginning at 5th Street. The Project proposes to operate six (6) additional buses per hour at peak times along the shared BAT lane on 5th Street and at the 5th Street Platform. The historic property is within a busy downtown setting that currently has buses operating along

\(^{67}\) Minnesota Department of Transportation, METRO Gold Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties, draft text as of September 2020.
adjacent streets, and the operation of six (6) additional buses per hour would be a minor change. The operation of Rush Line BRT Project buses would not affect the integrity of the Pioneer, Endicott, and Endicott Arcade buildings.

Potential queuing issues were identified along Robert at both 5th and 6th Streets East, where northbound through and right-turn movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be minimized through diversion to alternative routes. Despite the queuing issues identified at two (2) intersections with Robert, the increases in traffic would not impact the historic property and the relationship between the Pioneer, Endicott and Endicott Arcade buildings. The Project would not result in the loss of any on-street parking spaces in the vicinity of the property.

**Recommended Finding: No Adverse Effect**

Based on the 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on the Pioneer and Endicott Buildings**. The historic property would not be physically affected by the Project, nor would any Project elements be visible from the historic property. The negligible increase in bus traffic proposed in the vicinity of the historic property due to the Rush Line BRT Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

**Manhattan Building (aka Empire Building) (RA-SPC-3170)**

360 North Robert Street, Saint Paul

**Description & Historic Significance**

Constructed in 1890, the Manhattan Building is a seven (7)-story, Second Renaissance Revival Style office building with a raised basement located on the eastern corner of the 5th and Robert Street intersection in downtown Saint Paul (Figure 16). Designed by Saint Paul architect Clarence H. Johnston, Sr., the masonry building has a tripartite form with a steel beam framing system and vaults extending out under the sidewalks in front of the building. The first-story base is faced with bands of polished dark red granite and smooth limestone, which are part of a 1950s remodeling of the first floor by Toltz, King, and Day, likely as part of the city's modernization efforts. The unaltered upper floors are faced with red brick, and include a four (4)-story shaft with quoining at the corners surmounted by an entablature, and a two (2)-story capital with an elaborate metal cornice with lions head scuppers. Windows are arranged in vertical columns with round-arched openings on the top floor.

---

The Manhattan Building was listed in the National Register in 1988. It is significant under Criterion A in the area of Commerce for its role as an example of the “palace of commerce” banks constructed in the late 19th century. It is also a significant example of the construction in Saint Paul during a building boom from the late 1880s to the early 1890s, when the city was an important Midwestern financial center. The building is significant under Criterion B for its association with Clarence H. Johnston, Sr., whose office was in the building during his entire tenure as State Architect. It is significant under Criterion C in the area of Architecture as an example of a 19th-century, Renaissance Revival style bank building. The period of significance begins with the building’s construction in 1890 and ends with Johnston’s death in 1936. Overall, the Manhattan Building retains sufficient integrity to convey its significance, although the first floor does not retain integrity from the period of significance. In the 1950s, pink and grey polished marble were laid horizontally along the first floor, covering the original rusticated block facing, and the main entrance was altered. While the building was listed in the National Register with these modifications in place, their presence does render the first floor of the building incongruous with the upper floors. Character-defining features of the building include its architectural design: boxy, cubical massing with vaults extending out under the sidewalk; and classically inspired stylistic features on its exterior. These stylistic features include window surrounds, decorative sandstone friezes with brackets or dentils, pilasters, and cornice.

**Potential Effects**
The proposed Rush Line BRT Project includes operation of BRT vehicles along 5th Street in front of the Manhattan Building (see Sheet 5 of the 15% Plans and Figure 15). The proposed 10th Street Station would be located 1850 feet north of the northern boundary of the property and construction at the Union Depot would be located 700 feet east of the historic property. As noted on the 15% Plans, other

---

70 This first-floor applied cladding was on the Manhattan Building at the time of its National Register listing and may be considered a character-defining feature.
new BRT elements within the historic property and shared by the Rush Line BRT Project are proposed for construction under the METRO Gold Line BRT Project. These include the construction of the 5th Street Platform, as well as street reconstruction, curb and sidewalk removal, and the placement of new infrastructure such as signage and signaling. Temporary and permanent physical, visual, and other potential Project effects due to the construction of those BRT elements are assessed under the Gold Line Project. Therefore, the primary potential Rush Line BRT Project effects on the historic property include changes in traffic, access, and parking.

Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect the Manhattan Building. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
Neither the proposed 10th Street Station nor the proposed construction at Union Depot would be visible from the Manhattan Building.

Traffic, Access, and Parking
As noted in the “General Project Effects” section, in-depth traffic analysis was not performed in most of downtown Saint Paul because BRT buses would run in mixed traffic and result in only a 1 to 2% change in traffic volumes. This increase is above those expected under the METRO Gold Line BRT Project, which identified just 1.1 and 1.3% increases on 6th and 5th Street, respectively. Rush Line BRT traffic analysis did include Robert Street, beginning at 5th Street. The Project proposes to operate six (6) additional buses per hour at peak times along the shared BAT lane on 5th Street and at the 5th Street Platform. The historic property is within a busy downtown setting that currently has buses operating along adjacent streets, and the operation of six (6) additional buses per hour would be a minor change. The operation of Rush Line BRT Project buses would not affect the integrity of the Manhattan Building.

Potential queuing issues were identified along Robert at both 5th and 6th Streets East, where northbound through and right-turn movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be minimized through diversion to alternative routes. Despite the queuing issues identified at two (2) intersections with Robert, the increases in traffic would not impact the historic property. The Project would not result in the loss of any on-street parking spaces in the vicinity of the property.

Recommended Finding: No Adverse Effect
Based on the 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect on the Manhattan Building. The historic property would not be physically affected by the Project, nor would any Project elements be visible from the historic property. The negligible increase in bus traffic proposed in the vicinity of the historic property due to the Rush Line BRT Project would not alter any of the

71 Minnesota Department of Transportation, METRO Gold Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties, draft text as of September 2020.
72 Minnesota Department of Transportation, METRO Gold Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Final Determination of Effect for Historic Properties, draft text as of September 2020.
characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

**Golden Rule Department Store Building (RA-SPC-3171)**
85–95 7th Place, Saint Paul

*Description & Historic Significance*

The Golden Rule Department Store Building (RA-SPC-3171) is a six (6)-story, flat-roofed commercial building that has been converted into office use (Figure 17).⁷⁴ Golden Rule Fancy Goods and Toys was a general dry goods store operated by the firm W.H. Elsinger & Co., established by brothers William and Joseph Elsinger in 1886. The company moved to a three (3)-story commercial building on East 7th Street in 1891 and was known as the Golden Rule beginning in 1897. The store followed national retail trends and grew into a modern department store with many urban amenities, including a post office, playground, and infirmary. In 1902, Minnesota master architect Clarence Johnston, Sr., gave the East 7th Street building a classical façade. In additional phases of construction, Johnston expanded and remodeled the building until its unified Neoclassical design occupied three-quarters of the city block. The primary street elevations on 7th Place and Robert Street are stone and terra cotta and the secondary elevations on 7th and Minnesota Streets are brick with a cementitious parge coat. In addition to tall storefronts that feature anodized aluminum window frames with polished marble panels, the building has tripartite groupings of windows separated by pilasters that extend from the second through the sixth stories. The projecting cornice of green marble and terra cotta is on top of a wide frieze.

*Figure 17. Golden Rule Department Store Building, facing northwest.*⁷⁵

The Golden Rule Department Store Building is eligible for inclusion in the National Register under Criterion A in the area of Commerce for its association with national retail trends resulting in local retailers constructing new buildings and expanding existing stores and as one of the best Downtown

---


⁷⁵ Image from “Golden Rule Department Store (RA-SPC-3171),” Minnesota Individual Property Inventory Form, 8.
Saint Paul examples of an early 20th-century department store for a major local retailer. It is also eligible under National Register Criterion C in the area of Architecture, for its association with master architect Clarence Johnston, Sr., and as a distinctive example of his use of the Neoclassical style in commercial design. The period of significance begins in 1915 when the last expansion of the building was completed and ends in 1961 when Golden Rule merged with Donaldson’s Department Store. The setting has been altered with new building construction, the conversion of 7th Street to 7th Place, but the overall downtown setting remains. The building’s alterations include the addition of the skyways and the removal of ornamentation for Modernist finishes to the first story elevation on 7th Place. The property retains enough historic materials and workmanship to convey the Golden Rule Department Store Building’s significance under Criteria A and C. The character-defining features include the Neoclassical design, pilaster columns, wide frieze, projecting modillioned cornice, large-scale commercial building, and centralized location in downtown St. Paul.

Potential Effects
The proposed Rush Line BRT Project includes operation of BRT vehicles along Robert Street east of the property (see Sheet 5 of the 15% Plans and Figure 18). As noted on the 15% Plans, the only proposed construction under Rush Line BRT in the vicinity of the historic property includes the proposed 10th Street Station located 840 feet north of the property and a sidewalk reconstruction at the northeast corner of 6th Street and Robert Street 350 feet south of the building. Additional reconstruction of Robert Street is proposed under the Robert Street Reconstruction project. Temporary and permanent physical, visual, and other potential Project effects due to the street reconstruction will be assessed under that Federal undertaking. The only other change near the historic property proposed under the Rush Line BRT Project includes removal of left-turn lanes and the conversion of outside lanes on Robert Street into BAT lanes. The roadway dimension would not be altered; however, the change includes removal of 11 time-restricted parking spaces between 7th Street and 7th Place. Therefore, in addition to the potential visual effect to the Golden Rule Department Store Building due to the construction of the 10th Street Station and the reconstruction of the sidewalk, potential Rush Line BRT Project effects include changes in traffic, access, and parking.
Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect the Golden Rule Department Store Building. Therefore, the proposed Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
Neither the proposed 10th Street Station nor the proposed reconstruction of the sidewalk would affect viewsheds to or from the Golden Rule Department Store Building; therefore, they would not diminish the property’s integrity of setting, association, or feeling. The introduction of the proposed BAT lane along Robert Street is a minor change to a previously altered setting.

Traffic, Access, and Parking
Rush Line BRT traffic analysis included Robert Street. Potential queuing issues were identified along Robert at both 7th Place and 7th Street, where northbound and southbound movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be
minimized through diversion to alternative routes. Despite the queuing issues identified along Robert Street, the increases in traffic would not impact the Golden Rule Department Store’s location or relationship with its downtown setting. The Project proposes to remove parking spaces between 7th Street and 7th Place, immediately adjacent to the historic property. However, Project documentation confirms that there are many other on-street and off-street parking options in this area and that the loss of parking would not negatively impact community facilities, character, or cohesion. Thus, the parking needed for access to the historic property would not be negatively impacted.

**Recommended Finding: No Adverse Effect**

Based on the 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on the Golden Rule Department Store Building**. The historic property would not be physically affected by the Project, nor would any Project elements be visible from the historic property. The negligible increase in bus traffic proposed in the vicinity of the historic property due to the Rush Line BRT Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

**Foot, Schulze & Company Building (RA-SPC-3174)**
500 North Robert Street, Saint Paul

**Description & Historic Significance**

The Foot, Schulze & Company Building (RA-SPC-3174) is a seven (7)-story, flat-roofed manufacturing building that has been converted into residential and commercial uses. Minneapolis architecture firm Kees and Colburn designed the U-shaped building, which was built in 1917 and occupies half of a city block in a prominent location. Established in 1884, Foot, Schulze and Company had become one of the largest shoe manufacturers in Saint Paul during the early 20th century. Kees and Colburn incorporated technological advancements in the design, including concrete framing, concrete foundation, flat-slab reinforced concrete floors, and large windows into the Robert Street facility, doubling the company’s production volume during the decade it occupied the building. Street elevations are red brick with terra cotta ornament, a stone watertable, and stone bands above the second, third, and seventh floors (Figure 19). Along the Robert Street elevation, the building contains 12 large bays and glass-and-aluminum storefronts separated by brick pilasters.

---

78 Information on the Foot, Schulze & Company Building comes from Andrew Schmidt, “Foot, Schulze and Co (RA-SPC-3174),” Minnesota Individual Property Inventory Form, 2018.
The Foot, Schulze & Company Building is eligible for inclusion in the National Register under Criterion A in the area of Industry for its association with the shoe manufacturing industry in Saint Paul. It is also eligible under Criterion C in the area of Architecture, for its association with Kees and Colburn and as a good example of the urban vertical factory type. The period of significance begins in 1917 when the building was completed and the factory opened and ends in 1927 when Foot, Schulze and Company left the building. The building is no longer used as a factory and warehouse, which diminishes the integrity of association. The setting has been altered since the period of significance, including the construction of several new buildings nearby. Overall, the Foot, Schulze & Company Building retains integrity of location, design, materials, setting, workmanship, and feeling to convey its significance under Criteria A and C. Character-defining features include the overall massing and architectural design, the concrete flat-slab construction system, and large window openings.

**Potential Effects**

The proposed Rush Line BRT Project includes operation of BRT vehicles along Robert Street in front of the property (see Sheet 5 of the 15% Plans and Figure 20). As noted on the 15% Plans, the proposed construction under Rush Line BRT in the vicinity of the historic property includes the proposed 10th Street Station located 100 feet from the property; the historic property is not in the LOD for construction of the station. Additional reconstruction of Robert Street is included under the proposed Robert Street Reconstruction project. Temporary and permanent physical, visual, and other potential Project effects due to the street reconstruction will be assessed under that Federal undertaking. The only other change near the historic property proposed under the Rush Line BRT Project includes removal of left-turn lanes and the conversion of outside lanes on Robert Street into BAT lanes. The roadway dimension would not be altered; however, the proposed change includes the removal of on-street parking spaces along Robert Street. Therefore, in addition to the potential visual effect to the Foot,

---

79 Image from Andrew Schmidt, “Foot, Schulze and Co (RA-SPC-3174),” Minnesota Individual Property Inventory Form, 10.

Schulze & Company Building due to the construction of the 10th Street Station, potential Rush Line BRT Project effects include changes in traffic, access, and parking.

**Figure 20. Proposed Project plans within the vicinity of the Foot, Schulze & Company Building (outlined in blue) and the Produce Exchange Building (outlined in yellow).**

**Assessment of Effects**

**Physical**

As currently designed, the proposed Project would not directly, physically affect the Foot, Schulze & Company Building. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

**Visual**

Although the proposed 10th Street Station platforms are located across 10th Street, they would be visible from the Foot, Schulze & Company Building. However, the addition of the station shelters and associated infrastructure would be a minor change to the historic property’s setting, which has already been altered by new construction. Views to the historic property’s primary façades on Robert and 10th Streets would remain unobscured and the proposed station would not directly alter or further detract from the character-defining features of the building. Therefore, the station would not diminish the historic property’s integrity of setting, feeling, or association any further.
Traffic, Access, and Parking

Rush Line BRT traffic analysis included Robert Street. Potential queuing issues were identified along Robert at both 9th and 10th Street, where northbound and southbound movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be minimized through diversion to alternative routes.\(^{81}\) Despite the queuing issues identified along Robert Street, the increases in traffic would not impact access to the Foot, Schulze & Company Building. Robert Street would have a net loss of 32 on-street parking spaces, including 13 parking spaces between 9th and 10th Streets, immediately adjacent to the historic property. Business owners within the historic building have expressed concern about this potential loss of parking.\(^{82}\) However, Project documentation confirms that there are many other on-street and off-street parking options in this area and that the loss of parking would not negatively impact community facilities, character, or cohesion.\(^{83}\) Thus, the parking needed for access to the historic property would not be negatively impacted.

**Recommended Finding: No Adverse Effect**

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect to the Foot, Schulze & Company Building**. The historic property would not be physically affected by the Project. Although the 10th Street Station is anticipated to be visible from the historic property, any alterations to the viewshed would be minor and the views to and from the historic property’s primary façade would not be changed. Therefore, the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

**Produce Exchange Building (RA-SPC-6330)**

523 Jackson Street, Saint Paul

**Description & Historic Significance**

Constructed in 1915, the Produce Exchange Building is a three (3)-story, brick, Commercial-style building in downtown Saint Paul (Figure 21).\(^{84}\) With the expansion of railroads by the early 20th century, Saint Paul emerged as a major produce market and distribution city in the Upper Midwest. Produce was sold in produce exchanges and commission houses that were in downtown Saint Paul around Jackson and 11th Streets with connections to the railroad network and nearby freight depots. The Produce Exchange Building was a prominent commission house that supported the Saint Paul produce district and contributed to the overall produce industry in the area. The utilitarian design reflected the property’s use with its ground-level bays that housed vendors, stalls, and storefronts, upper level warehouse space, and drive-through entrance for the loading of goods.

---


The Produce Exchange Building is eligible for inclusion in the National Register under Criterion A in the area of Commerce for its prominent association with Saint Paul’s produce industry during the early 20th century. It may also be eligible under Criterion C in area of Architecture as an example of an early 20th century commission house. The period of significance begins in 1915 when the building was completed and ends in 1949, when the building began to house other industries. Overall, the Produce Exchange Building retains good integrity of location, materials, design, workmanship, and feeling to convey its significance. Character-defining features include the three (3)-story utilitarian design with first story commercial storefronts and warehouse space in upper stories, brick exterior cladding, multiple distinct bays on the Jackson and 10th Street elevations, simple one-over-one window configurations on the upper stories, painted signs on the brick, and a drive-through on the 10th Street elevation that allows access to the interior parking lot. The integrity of setting and association have been diminished by the loss of the adjacent markets and commission houses, and the property no longer houses the businesses associated with the produce industry.

Potential Effects
The proposed Project includes operation of BRT vehicles along Robert Street, approximately 210 feet from the Produce Exchange Building (see Sheet 5 of the 15% Plans and in Figure 20). As noted on the 15% Plans, proposed construction under Rush Line BRT in the vicinity of the historic property is limited to the proposed 10th Street Station on Robert Street, approximately 200 feet from the historic property. Additional reconstruction of Robert Street is included under the proposed Robert Street Reconstruction project. Temporary and permanent physical, visual, and other potential Project effects due to the street reconstruction will be assessed under that Federal undertaking. The only other change near the historic property proposed under the Project includes removal of left-turn lanes and the conversion of outside lanes on Robert Street into BAT lanes. The roadway dimension would not be altered; however, the

---

85 Image from Katie Ohland, “Produce Exchange Building (RA-SPC-6330),” Minnesota Individual Property Inventory Form, Figure 2.
86 In their comments on the architecture/history investigations, MnSHPO noted that “more information on the interior of the building and the character defining features of commission houses would be needed to justify significance under Criterion C in the area of Architecture.” Sarah Beimers, MnSHPO, letter to Jay Ciavarella, FTA, September 15, 2020.
proposed change includes the removal of on-street parking spaces along Robert Street. Therefore, in addition to the potential visual effect to the Produce Exchange Building from the construction of the 10th Street Station, potential Project effects include changes in traffic, access, and parking.

**Assessment of Effects**

**Physical**
As currently designed, the proposed Project would not directly, physically affect the Produce Exchange Building. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

**Visual**
The proposed 10th Street Station platforms are located on 10th Street, and would be minimally visible from the rear of the Produce Exchange Building due to intervening buildings. The addition of the station shelters and associated infrastructure would be a minor change to the historic property’s setting, which has already been altered. Views to the historic property’s primary façades on 10th and Jackson Streets would remain unobscured and the proposed station would not directly alter or further detract from the character-defining features of the building. Therefore, the station would not diminish the historic property’s integrity of setting, feeling, or association any further.

**Traffic, Access, and Parking**
Rush Line BRT traffic analysis identified potential queuing issues along Robert at both 10th and 11th Street, where northbound and southbound movements would result in blocked intersections and poor levels of service during peak traffic hours; these queuing issues can be minimized through diversion to alternative routes. Despite the queuing issues identified along Robert Street, the increases in traffic would not impact access to the historic property. The Project would not result in the loss of any on-street parking spaces immediately adjacent to the Produce Exchange Building. To the west of the historic property, Robert Street would have a net loss of 32 on-street parking spaces. However, Project documentation confirms that there are many other on-street and off-street parking options in this area and that the loss of parking would not negatively impact community facilities, character, or cohesion.

Thus, the parking needed for access to historic properties within the district would not be negatively impacted.

**Recommended Finding: No Adverse Effect**
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on the Produce Exchange Building**. The historic property would not be physically affected by the Project and, because of its location and intervening visual obstructions, the 10th Street Station is anticipated to be minimally visible from the rear of the Produce Exchange Building. Any alterations to the viewshed would be minor and the primary views to and from the property would not be changed. Therefore, the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

---

Resources Associated with the Great Northern Railroad

Three historic resources associated with the Great Northern Railroad are located in close proximity to each other within the Project APE (see Page 2 of the APE map in Appendix B):

- Great Northern Saint Paul to Minneapolis Railroad Corridor Historic District (RA-SPC-5918)
- StPM&M Railway Company Shops Historic District (RA-SPC-4582)
- Westminster Junction (RA-SPC-5618)

Potential Project effects on these three (3) resources are assessed collectively due to their historical association and close proximity.

Description & Historic Significance

Great Northern Railroad Corridor Historic District (RA-SPC-5918)
Saint Paul to Minneapolis Segment, Saint Paul

The Great Northern Railroad Corridor between Saint Paul and St. Anthony Falls in Minneapolis was completed in 1862 by the St. Paul and Pacific Railroad Company (see Figure 22). Acquired by the Manitoba Railroad in 1978 and by the Great Northern in 1907, the line later became the Burlington Northern Santa Fe (BNSF). The corridor, documented as the earliest railroad corridor in Minnesota, established a rail connection between the Minneapolis milling operations at St. Anthony Falls and an important Mississippi River transfer point at Lowertown in Saint Paul. The corridor would eventually serve an important role within the Great Northern’s transcontinental railroad corridor. The active double-track roadway is a graded ground surface featuring one (1) to two (2) feet of crushed granite ballast supporting wooden ties and steel rails (see Figure 23).

Figure 22. Great Northern Corridor, in blue.

---

In 2009, the Great Northern Railroad Corridor Historic District was recommended eligible for inclusion in the National Register under Criterion A in the area of Transportation. The historic property meets the registration requirements for a railroad corridor historic district as outlined in the National Register Multiple Property Documentation Form (MPDF), “Railroads in Minnesota, 1862–1956” (Railroad MPDF). The period of significance begins in 1862, when the corridor was completed, and ends in 1956 based on the registration requirements for railroad corridor historic districts as described in the Railroad MPDF. Both the StPM&M Railway Company Shops Historic District and Westminster Junction are contributing resources to the Great Northern Railroad Corridor Historic District. The district retains integrity of location, design, feeling, association, and setting, including its urban setting and many buildings and structures from the period of significance. Character-defining features include the railroad roadway and overall right-of-way width.

StPM&M Railway Company Shops Historic District (RA-SPC-4582)
Jackson Street and Pennsylvania Avenue, Saint Paul

The StPM&M Railway Company Shops Historic District was built between 1882 and 1944 and is commonly and historically known as the Jackson Street Shops (see Figure 24). The contributing resources include a roundhouse (RA-SPC-5555), power house (no inventory number), machine shop (RA-SPC-8072), pattern shop (RA-SPC-8073), storehouse (RA-SPC-8074), and three (3) spur tracks. Of these, only the roundhouse is partially within in the Project APE.

91 Image from Schmidt and Kampinen, Phases I and II Architectural History Studies for the Reconstruction of I-35E from University Avenue to Maryland Avenue, St. Paul, Ramsey County, Minnesota, 2010, 35.
Figure 24. StPM&M Railway Company Shops Historic District

Originally listed in the National Register in 1987, the National Register nomination was amended in 2017 to address the registration requirements in the Railroad MPDF. At that time, the historic property’s original boundary was also expanded. The StPM&M Railway Shops Historic District is significant at the state level under Criterion A in the area of Transportation as a railroad yard associated with the historically significant StPM&M/Great Northern Railroad Corridor, which was recommended eligible for inclusion in the National Register in 2009 (see above). The period of significance for the StPM&M Railway Company Shops Historic District begins in 1882, when the first buildings were completed and ends in 1956 based on the registration requirements for railroad yard historic districts as described in the Railroad MPDF. The historic property maintains integrity of location, design, materials, workmanship, setting, feeling, and association. Character-defining features include the individual resources themselves, their spatial relationship to each other and to the Great Northern mainline, and the light industrial setting that feels isolated due to vegetation and topography.

Westminster Junction (RA-SPC-5618)

Roughly bounded by the Lafayette Road Bridge, I-35E, a line approximately 1,300 feet south of the Cayuga Street Bridge, and a line approximately 400 feet southwest of the Cayuga Street/Phalen Boulevard intersection, Saint Paul

Westminster Junction is a limestone grade separation structure built to accommodate several railroad lines within the narrow Trout Brook ravine, one of the few routes out of downtown Saint Paul through the Mississippi Valley bluffs. The distinctive construction—essentially two (2) wye junctions placed on top of one another—consists of railroad tracks, tunnels, retaining walls, culverts, sewer drains, and a

---

switching tower (Figure 25). The structure was built over several decades by the following railroad companies:

- Saint Paul & Pacific/StPM&M/Great Northern/Burlington Northern/BNSF
- Northern Pacific/Burlington Northern/BNSF
- Saint Paul, Stillwater & Taylors Falls/Saint Paul & Sioux City/Chicago, Saint Paul, Minneapolis & Omaha/Chicago & Northwestern/Union Pacific
- Minnesota, Saint Croix, and Wisconsin/Saint Paul & Saint Croix/Wisconsin Central/Soo Line

Figure 25. Westminster Junction from the Lafayette Road Bridge. The red arrow points to the Omaha Road veering to the east (right). The Great Northern Railroad Corridor is immediately to its left, veering west. A freight train on the Northern Pacific Railroad is in the East Side Line Tunnel. Above Westminster Junction, a prestressed concrete beam bridge from 2004 carries Phalen Boulevard; Rush Line BRT vehicles would pass over the Junction on this bridge.95

Westminster Junction is individually eligible for inclusion in the National Register under Criterion A in the area of Transportation and under Criterion C in the area of Engineering. Under Criterion A, Westminster Junction meets the Railroad MPDF registration requirements for a contributing resource within two (2) National Register-eligible railroad corridor historic districts: Saint Paul, Stillwater & Taylors Falls/Chicago, Saint Paul, Minneapolis & Omaha Railroad Corridor Historic District (StPS&TF/Omaha Road) (XX-RRD-CNW001, see below) and the Great Northern Railroad Corridor, St. Paul to Minneapolis Segment (RA-SPC-5918).96 Under Criterion C, Westminster Junction meets the Railroad

95 Image from Chris Hommerding, “Westminster Junction (RA-SPC-5618),” Minnesota Individual Property Inventory Form, Figure 3.
96 The corridors for the Northern Pacific (RA-SPC-5936) and the St. Paul & St. Croix Falls/Wisconsin Central/Soo Line Railway Segment (RA-SPC-8215) have previously been determined not eligible for individual listing on the National Register. Extant portions of the structure built by the Northern Pacific are included in the list of Westminster Junction’s character-defining features.
MPDF registration requirements for a grade separation structure as an engineering solution to the unusual problem of the convergence of multiple rail lines in the narrow Trout Brook ravine. The period of significance begins in 1885 and ends in 1945, reflecting the most significant years of Westminster Junction’s use. Westminster Junction retains its general configuration and four (4) of its tunnels from that period of significance. The Soo Line Tunnel, which was not part of the two (2) original wye junctions, is nonexistent. Despite this loss and the construction of the Phalen Avenue Bridge over the northern portion of Westminster Junction in 2004, the historic property retains integrity of location, setting, design, materials, workmanship, feeling, and association. Character-defining features include the two (2) grade-separated wye junctions and the stone and concrete structure, retaining walls, and culverts dating prior to 1945. Modern vegetation along the edges of the historic property screens modern development from view.

**Potential Effects**

The Project APE overlaps the Great Northern Railroad Corridor Historic District at the StPM&M Railway Company Shops Historic District and at Westminster Junction (see Sheets 6 and 7 of the 15% Plans and Page 2 of the Project APE in Appendix B). The BRT vehicles would operate within existing paved roadways near the StPM&M Railway Company Shops Historic District (where it would run in a dedicated BAT lane along Pennsylvania Avenue and in mixed traffic on the ramp between Pennsylvania Avenue and Jackson Street) and over the Great Northern Railroad roadway (where it would run in a dedicated BAT lane over the western portion of Westminster Junction). The Project would not have any direct, physical effects to any of the resources associated with the Great Northern Railroad. However, proposed physical changes in the vicinity of these historic properties include construction of the Mt. Airy Street, Olive Street, and Cayuga Street Stations, retaining walls, and BMPs, as well as conversion of existing pavement along Pennsylvania Avenue East and Phalen Boulevard into BAT lanes. Small partial property acquisitions would occur near all three (3) stations. Therefore, potential Project effects include visual effects of the proposed stations and potential changes in traffic, access, and parking.

**Assessment of Effects**

**Physical**

As currently designed, the proposed Project would not directly, physically affect any of the historic resources associated with the Great Northern Railroad. Therefore, the Project would not diminish the historic properties’ integrity of location, design, materials, or workmanship. The proposed LOD for a BMP abuts the historic boundary of Westminster Junction (see Sheet 7 of the 15% Plans). The size, depth, and design of the BMP will be informed by stormwater analysis currently underway. Any potential adverse physical effects caused by unintended damage from construction activities can be avoided with construction protection measures incorporated into contract documents.

**Visual**

The proposed Mt. Airy Street Station is located approximately 900 feet south of the StPM&M Railway Company Shops Historic District and includes construction of retaining walls and a potential stormwater BMP; none of this would be visible from the historic property due to the change in elevation. Two (2) potential stormwater BMP locations are proposed within the existing intersection between Pennsylvania Avenue East and Jackson Street, directly adjacent to the south boundary of the StPM&M Railway Company Shops Historic District (this intersection is visible in Figure 24). However, any construction within this intersection would not be visible from the historic property due to the change in elevation.
Therefore, although the potential stormwater BMPs are within close proximity to the StPM&M Railway Company Shops Historic District, they would not diminish the historic property’s integrity of setting, feeling, or association any further. These Project elements would not be visible from either the Great Northern Railroad Corridor Historic District or Westminster Junction.

The proposed Olive Street Station is located approximately 205 feet west of Westminster Junction’s western boundary and the proposed Cayuga Street Station is located immediately adjacent to Westminster Junction’s northern boundary. Neither the Olive Street Station nor the Cayuga Street Station would be visible from the StPM&M Railway Company Shops Historic District. The Olive Street Station would also not be visible from the Great Northern Railroad Corridor Historic District or Westminster Junction due to the change in elevation. The proposed Cayuga Street Station includes construction of dedicated BAT lanes and a retaining wall, in addition to the station platforms and amenities. It would also require minor partial property acquisition and widening of Phalen Boulevard to accommodate the approach to the northbound bus platform. In addition, a potential stormwater BMP is located adjacent to the northeastern edge of Westminster Junction’s boundary, between the existing railroad right-of-way and Phalen Boulevard. The removal and reintroduction of vegetation, the grading of the landscape, the construction of Project elements, and the operation of the BRT service along Phalen Boulevard all have the potential to have a permanent visual effect on Westminster Junction’s setting. However, reestablishing vegetation as part of design development for the BMP and reviewing the design of the Cayuga Street Station in accordance with the SOI Standards may minimize and/or avoid potential adverse effects.

Traffic, Access, and Parking

None of the existing access points to the resources associated with the Great Northern Railroad would be modified under the Project. The railroad roadways themselves would not be physically affected. Southbound BRT traffic would pass in front of the entry to the StPM&M Railway Company Shops in a dedicated BAT lane, and a new traffic signal would be introduced south of the property at the Mt. Airy Street Station; however, none of this would impede access to the historic properties. The Project is not expected to impact parking near this historic property.97

Recommended Finding

StPM&M Railway Company Shops Historic District: No Adverse Effect

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect on the StPM&M Railway Company Shops Historic District. The historic property would not be physically affected. The negligible increase in bus traffic in the vicinity of the historic property and the introduction of stormwater BMPs within the existing intersection of Pennsylvania Avenue East and Jackson Street would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

---

Great Northern Railroad Corridor Historic District & Westminster Junction: No Adverse Effect with Conditions

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on the Great Northern Railroad Corridor Historic District and Westminster Junction if certain conditions are placed on the Project.** Construction of the Project would not physically affect any of the historic properties associated with the Great Northern Railroad Corridor and, therefore, would not diminish their integrity of location, design, materials, or workmanship. Although construction of the Project would introduce temporary and permanent visual effects within the viewshed of the Great Northern Railroad Corridor Historic District and Westminster Junction, the proposed conditions ensure the Project would not alter any of the characteristics that qualify the historic properties for inclusion in the National Register or diminish their integrity of setting, feeling, or association. The recommended finding of No Adverse Effect is therefore dependent upon the following conditions being placed on the Project:

- As part of design development along the northeastern edge of the historic property, vegetative screening will be reestablished between Westminster Junction and the BMP west of the Cayuga Street Station.
- To minimize visual impact and maximize compatibility with Westminster Junction while still meeting the Project’s Purpose and Need, the design of the Cayuga Street Station and BMP will be reviewed according to the SOI Standards at the Project’s 30%, 60%, 90%, and 100% Plans, with a consultation meeting prior to finalization of 60% design. The consultation meeting will also determine whether a CPPHP is necessary to ensure Westminster Junction is physically protected during construction of the Project.

Saint Paul, Stillwater & Taylors Falls/Chicago, Saint Paul, Minneapolis & Omaha Railroad Corridor Historic District (XX-RRD-CNWO01)

Saint Paul to Stillwater Junction Segment, Saint Paul

**Description & Historic Significance**

The StPS&TF/Omaha Road Railroad Corridor Historic District is an approximately 15-mile-long railroad corridor running roughly northeast-southwest between the Saint Paul Union Depot (RA-SPC-5225, RA-SPC-6907) and Stillwater Junction, southwest of Stillwater (see Figure 26).\(^98\) Although the majority of the corridor is a single track, a portion of its length contains double track. There are a number of abandoned sidings associated with former industrial properties along the route. The StPS&TF Railroad constructed the corridor in 1871 to connect Saint Paul to lumber mills in Stillwater and Taylors Falls. In 1880, the Saint Paul and Sioux City Railroad acquired the corridor and then sold it to the Omaha Railroad later that same year. Although it would be acquired by the Chicago & Northwestern Railroad in 1882, the corridor continued to operate as the Omaha Road until 1957. As part of Chicago & Northwestern, this railroad segment became part of a broad railroad corridor connecting lumber and agriculture areas between Chicago, Saint Paul, and Omaha and providing important links to eastern and western markets. The

---

Chicago & Northwestern, including the portion operated as the Omaha Road, is one (1) of three (3) important Granger railroads in the state.\textsuperscript{99} The StPS&TF/Omaha Road Historic District includes a number of contributing and noncontributing resources; those located within the Rush Line BRT APE are included in Table 5.

\textbf{Table 5. StPS&TF/Omaha Road Resources in the Project APE}

<table>
<thead>
<tr>
<th>Inventory No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>XX-RRD-CNWO01</td>
<td>Extant roadway (including sidings within the corridor)</td>
<td>Throughout corridor</td>
<td>C</td>
</tr>
<tr>
<td>RA-SPC-5618</td>
<td>Westminster Junction</td>
<td>Roughly bounded by the Lafayette Road Bridge, I-35E, a line approximately 1,300 feet south of the Cayuga Street Bridge, and a line approximately 400 feet southwest of the Cayuga Street/Phalen Boulevard intersection, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>N/A</td>
<td>Phalen Boulevard Bridge (MnDOT Bridge 62598) over Corridor</td>
<td>Omaha Road at Phalen Boulevard, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>N/A</td>
<td>Edgerton Street Bridge (MnDOT Bridge 62567) over Corridor</td>
<td>Omaha Road at Edgerton Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>N/A</td>
<td>Payne Avenue Bridge (MnDOT Bridge 62544) over Corridor</td>
<td>Omaha Road at Payne Avenue, Saint Paul</td>
<td>NC</td>
</tr>
</tbody>
</table>

Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

<table>
<thead>
<tr>
<th>Inventory No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-11130</td>
<td>Phalen Creek Valley Bridge (no MnDOT information available) carrying Corridor</td>
<td>Omaha Road, 250 feet east of Payne Avenue, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>N/A</td>
<td>Arcade Street Bridge (MnDOT Bridge 62062) over Corridor</td>
<td>Omaha Road at Arcade Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-1294</td>
<td>Forest Street Bridge (MnDOT Bridge 5962) over Corridor</td>
<td>Omaha Road at Forest Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>N/A</td>
<td>Earl Street Bridge (MnDOT Bridge 62545) over Corridor</td>
<td>Omaha Road at Earl Street, Saint Paul</td>
<td>NC</td>
</tr>
</tbody>
</table>

The StPS&TF/Omaha Road Historic District is eligible for inclusion in the National Register under Criterion A in the area of Transportation. It meets the Railroad MPDF registration requirements for a railroad corridor historic district as a railroad that made an early connection between Saint Paul and Chicago and as a Granger Railroad, providing transportation for agricultural products from southern Minnesota to terminal markets in Saint Paul, Chicago, and Omaha. The period of significance begins in 1871, when the railroad was completed between Union Depot and Stillwater Junction, and extends to 1957 when the Omaha Road ceased to operate independently and formally merged with the Chicago & Northwestern. Despite the loss of the roundhouse and switching yards and the construction of Phalen Boulevard between Westminster Junction and Johnson Parkway, the StPS&TF/Omaha Road Historic District retains sufficient integrity of location, design, materials, feeling, and association to convey its historic significance. Character-defining features include the extant roadway (railroad bed, cuts, fills, and ditches) and grade-separation structures at Westminster Junction, Phalen Creek Valley, Johnson Parkway, and Stillwater Boulevard.

Potential Effects

The Project APE overlaps the StPS&TF/Omaha Road Railroad Corridor Historic District beginning at Westminster Junction on the west and continuing eastward until Phalen Boulevard veers away from the railroad corridor near Duluth Street on the east (see Pages 2, 3, and 4 of the Project APE in Appendix B). For the vast majority of the overlapping area, BRT vehicles would operate within existing paved roadways, dedicated BAT lanes, or the newly constructed dedicated BRT roadway without the potential to have direct, physical effects to the historic property. However, there are a number of exceptions, which are noted below. Proposed physical changes in the vicinity of the historic property include construction of the Olive Street, Cayuga Street, Payne Avenue, and Arcade Street Stations, retaining walls, and BMPs, as well as conversion of existing pavement along Phalen Boulevard into dedicated BAT lanes and construction of a dedicated BRT roadway east of Arcade Avenue. The transition to the dedicated BRT roadway would also include construction of the Arcade Street Ramp immediately adjacent to the historic property. Small property acquisitions would occur near all stations and along the dedicated BRT roadway. Additional property acquisitions are proposed near the Arcade Street Station and between Earl and Frank Streets to accommodate potential stormwater BMPs. Therefore, in addition to the potential physical effects, potential Project effects include visual effects of the proposed stations and the Arcade Street Ramp and potential changes in traffic, access, and parking.
Assessment of Effects
Physical
In addition to BRT vehicles operating in a dedicated BAT lane over the western portion of Westminster Junction, the proposed Project intersects with the StPS&TF/Omaha Road Railroad Corridor Historic District in the following ways:

- BRT vehicles are proposed to operate under the Forest Street Bridge (MnDOT Bridge 5962), which is a contributing resource within the StPS&TF/Omaha Road Railroad Corridor Historic District. The location of the Bruce Vento Regional Trail would also be shifted under this historic resource (see Figure 27). No physical improvements are proposed for the actual bridge.
- Improvements are proposed for two (2) noncontributing bridges that also cross over the StPS&TF/Omaha Road Railroad Corridor Historic District. At the Payne Avenue Bridge (MnDOT Bridge 62544), improvements would be made to accommodate sidewalk connections to the Payne Avenue Station. At the Arcade Street Bridge (MnDOT Bridge 62062), improvements would be made to accommodate sidewalk connections to the Arcade Street Station and to construct the Arcade Street Ramp from Arcade Street to the dedicated BRT roadway north of Phalen Boulevard. The Arcade Street Ramp is immediately adjacent to the StPS&TF/Omaha Road Railroad Corridor Historic District property boundary, which extends across Phalen Boulevard at this location (see Figure 27).
- BRT vehicles would also operate on or under noncontributing bridges that also cross over the StPS&TF/Omaha Road Railroad Corridor Historic District. These bridges include the Phalen Boulevard Bridge (MnDOT Bridge 62598), Edgerton Street Bridge (MnDOT Bridge 62567), and the Earl Street Bridge (MnDOT Bridge 62545). The location of the Bruce Vento Regional Trail would also be shifted under the Earl Street Bridge. No physical improvements are proposed for these bridges.

Figure 27. Boundary of StPS&TF/Omaha Road Railroad Corridor Historic District near the Arcade Street Ramp.
Because the only physical improvements that could impact the StPS&TF/Omaha Road Railroad Corridor Historic District are minor improvements proposed to noncontributing resources, the Project would not diminish the integrity of design, materials, or workmanship of the historic property.

The proposed LOD for construction abuts the historic boundary of the StPS&TF/Omaha Road Railroad Corridor Historic District in several locations. However, any potential adverse physical effects caused by unintended damage from construction activities can be avoided with construction protection measures incorporated into contract documents.

Visual
The proposed Cayuga Street Station is located immediately adjacent to the northern boundary of Westminster Junction and the StPS&TF/Omaha Road Railroad Corridor Historic District. The proposed Payne Avenue Station would be located approximately 160 feet north of the StPS&TF/Omaha Road Railroad Corridor Historic District’s northern boundary and the Arcade Street Station would be approximately 500 feet north of the boundary, on the opposite side of Phalen Boulevard (see Sheets 7, 8, and 9 of the 15% Plans). Construction of these station areas would include dedicated BRT lanes, medians, retaining walls, and station platforms and amenities. The construction of these Project elements has the potential to have a permanent visual effect on the historic property’s setting. The Arcade Street Ramp, which is located immediately adjacent to the historic property’s northern boundary, would also be visible from the StPS&TF/Omaha Road Railroad Corridor Historic District.

Three potential stormwater BMP locations would be located adjacent to the northern edge of the historic property boundaries at Payne Avenue, between the existing railroad roadway and Phalen Boulevard (see Sheet 8 of the 15% Plans). Other stormwater BMPs are proposed on the opposite side of Phalen Boulevard from the historic district’s boundaries and are less likely to be visible from the historic property. These proposed BMPs would be located at Burr Street, between Neid Lane and Arcade Street, between Earl Street and Frank Street, and east of Frank Street (see Sheets 8, 9, and 10 of the 15% Plans).

The removal and reintroduction of vegetation, the grading of the landscape, the construction of Project elements, and the operation of the BRT service along Phalen Boulevard all have the potential to have a permanent visual effect on the historic property. The construction of Phalen Boulevard and the removal of industrial properties between Westminster Junction and Johnson Parkway have already diminished the property’s integrity of setting. The property evaluation notes the historic district retains a “high degree of integrity of location, design, and materials” in this area and remains “sufficiently wide to maintain the feeling and association of the corridor and, as such, this segment retains integrity of setting.” No change is proposed to the width of the historic property’s right-of-way and the introduction of most Project elements on the opposite side of Phalen Boulevard would not further impact the property’s setting.

Three Project elements abut the historic property boundary. Near the Arcade Street Ramp, the boundary overlaps with the modern construction of Phalen Boulevard. Because the historic property was altered severely by the construction of Phalen Boulevard in this area, the construction of the Arcade Street Ramp will not diminish the historic property’s integrity of setting, feeling, or association any further. However, both the Cayuga Street Station and the safety barriers under the historic Forest Street Bridge have the potential to diminish the property’s historic setting. In these areas, reviewing Project
design in accordance with the SOI Standards may minimize and/or avoid potential adverse effects due to visual changes.

Traffic, Access, and Parking

The proposed Project would not physically affect the railroad roadways of the StPS&TF/Omaha Road Railroad Corridor Historic District or any of the existing access points to contributing resources. Although traffic queuing concerns have been identified along Phalen Boulevard at Olive Street and at the intersection of Neid Lane and Arcade Street, the Project incorporates improvements and the queuing issues can be minimized through extended turning lanes and adjusting signal timing. There would be minimal to no changes to traffic signals at Phalen Boulevard’s intersections with Olive Street, Cayuga Street, Payne Avenue, and Johnson Parkway. New traffic signals are proposed at Phalen Boulevard’s intersections with Neid Lane, Arcade Street, Mendota Circle, Wells Street, and Frank Street. In addition, a new pedestrian signal would be provided to facilitate crossing the dedicated BRT roadway near Atlantic Street. None of these signal modifications would impede access to the historic property. The Project is not expected to impact parking near this historic property.

Recommended Finding: No Adverse Effect with Conditions

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect to the StPS&TF/Omaha Road Railroad Corridor Historic District if certain conditions are placed on the Project. No Project elements would physically affect the historic property or its contributing resources; however, the proximity of the LOD to the historic property may necessitate construction protection measures to ensure that no historic properties are unintentionally damaged in a way that would diminish the historic property’s integrity of location, design, materials, or workmanship. Although construction of the Project would introduce temporary and permanent visual effects within the viewshed of the StPS&TF/Omaha Road Railroad Corridor Historic District, the proposed conditions also ensure the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish its integrity of setting, feeling, or association. The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

- As part of design development along the northern edge of the historic property, vegetative screening will be reestablished wherever possible between Project elements and the StPS&TF/Omaha Road Railroad Corridor Historic District.
- To minimize visual impact and maximize compatibility with the StPS&TF/Omaha Road Railroad Corridor Historic District while still meeting the Project’s Purpose and Need, the design of the Cayuga Street Station and any physical barriers needed in proximity to the Forest Street Bridge (MnDOT Bridge 5962) will be reviewed according to the SOI Standards at the Project’s 30%, 60%, 90%, and 100% Plans, with a consultation meeting prior to finalization of 60% design. The consultation meeting prior to the finalization of the 60% design will also determine whether a CPPHP is necessary to ensure the StPS&TF/Omaha Road Railroad Corridor Historic District is physically protected during construction of the Project. Consideration will be given to areas where the LOD abuts the historic property boundary (e.g., near Westminster Junction, Cayuga Street, east of Payne Avenue, and other areas) and for the Forest Street Bridge (MnDOT Bridge

---

Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

5962) where the dedicated BRT roadway and Bruce Vento Regional Trail are being built under the historic resource.

Resources Associated with the Lake Superior & Mississippi Railroad
A number of resources associated with the LS&M Railroad are located within the Project APE. Due to the close historical associations of the properties, potential Project effects are assessed collectively. The Project APE overlaps two (2) segments of the LS&M Railroad:

- Saint Paul to White Bear Lake Segment (XX-RRD-NPR001)
- White Bear Lake to Hugo Segment (XX-RRD-NPR005)

The White Bear Lake to Hugo Segment has only one (1) contributing resource in the Project APE: the railroad roadway. However, the Saint Paul to White Bear Lake Segment has numerous contributing and noncontributing resources. The contributing and noncontributing resources located within the Project APE are outlined in Table 6 and the corridor is shown in Figure 28.

Table 6. LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Resources in the Project APE

<table>
<thead>
<tr>
<th>Inventory or Site No.</th>
<th>Property Name</th>
<th>Address</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-11130</td>
<td>Omaha Road Bridge (no bridge number) over roadway</td>
<td>260 feet east of Payne Avenue, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>Phalen Boulevard Bridge (Bridge 62616) over roadway</td>
<td>Phalen Boulevard, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>n/a</td>
<td>Neid Lane Bridge (Bridge 62617) over roadway</td>
<td>Neid Lane, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>n/a</td>
<td>Arcade Street Bridge (Bridge 62062) over roadway</td>
<td>Arcade Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-1294</td>
<td>Forest Street Bridge (Bridge 5962) over roadway</td>
<td>Forest Street, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>Earl Street Bridge (Bridge 62545) over roadway</td>
<td>Earl Street, Saint Paul</td>
<td>NC</td>
</tr>
<tr>
<td>RA-SPC-11140</td>
<td>Bridge R0438 carrying railroad over former local road (now pedestrian path connecting McAfee Street to East Shore Drive) which travels through tunnel</td>
<td>750 feet south of Arlington Avenue, Saint Paul</td>
<td>C</td>
</tr>
<tr>
<td>21RA0082</td>
<td>Privy site 21RA0082</td>
<td>North of Frost Avenue, Maplewood</td>
<td>NC</td>
</tr>
<tr>
<td>XX-RRD-NPR004</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Eldridge Avenue East and County Road B East, Maplewood</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>Bridge 62004 carrying roadway over TH 36</td>
<td>TH 36, Maplewood</td>
<td>NC</td>
</tr>
<tr>
<td>XX-RRD-NPR003</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between County Road C and Gervais Avenue, Maplewood</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>County Road C Bridge (Bridge 62563) over roadway</td>
<td>County Road C, Maplewood</td>
<td>NC</td>
</tr>
<tr>
<td>Inventory or Site No.</td>
<td>Property Name</td>
<td>Address</td>
<td>Status</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>XX-RRD-NPR002</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Kohlman Avenue and Beam Avenue, Maplewood</td>
<td>C</td>
</tr>
<tr>
<td>RA-MWC-0248</td>
<td>Railroad Bridge (Bridge 62529) over Beam Avenue</td>
<td>Beam Avenue, Maplewood</td>
<td>NC</td>
</tr>
<tr>
<td>RA-WBT-004</td>
<td>StP&amp;D Bridge No.7 (no MnDOT Bridge Number)</td>
<td>600 feet south of I-694 at original alignment of County Road D, Maplewood</td>
<td>NC</td>
</tr>
<tr>
<td>RA-WBC-0156</td>
<td>Railroad Bridge (Bridge 62822) over I-694</td>
<td>I-694, Vadnais Heights and White Bear Lake</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>TH 61 Bridge (Bridge 62092) over roadway</td>
<td>TH 61, Gem Lake and White Bear Lake</td>
<td>NC</td>
</tr>
<tr>
<td>n/a</td>
<td>1880s Roadway Realignment</td>
<td>Throughout Corridor</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>1868 Railroad Roadway under later fill embankment realignment</td>
<td>Johnson Parkway to Maryland Avenue East and Arlington Avenue East to Gervais Avenue</td>
<td>C</td>
</tr>
<tr>
<td>n/a</td>
<td>Bruce Vento Regional Trail</td>
<td>Portions of Corridor from Bruce Vento Nature Sanctuary to Buerkle Road</td>
<td>NC</td>
</tr>
</tbody>
</table>
Figure 28. LS&M Mainline Railroad Corridor. At the bottom of the image, the Saint Paul to White Bear Lake Segment is in green and the White Bear Lake to Hugo Segment is in blue.\textsuperscript{102}

\textsuperscript{102} Mead & Hunt, *Phase I Architecture/History Survey and Phase II Evaluation for the Rush Line Bus Rapid Transit Project*, Figure 6.
The following resources within the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment and the Project APE are also individually eligible for inclusion in the National Register:

- 1868 Alignment of the LS&M Railroad between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002)
- 1868 Alignment of LS&M Railroad between County Road C and Gervais Avenue (XX-RRD-NPR003)
- 1868 Alignment of the LS&M Railroad between Eldridge Avenue East and County Road B East (XX-RRD-NPR004)

Information specific to these historic properties is further discussed below.

**Description & Historic Significance**

**LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001)**

**1868 Alignment of the LS&M Railroad between Eldridge Avenue East and County Road B East (XX-RRD-NPR004)**

**1868 Alignment of LS&M Railroad between County Road C and Gervais Avenue (XX-RRD-NPR003)**

**1868 Alignment of the LS&M Railroad between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002)**

The LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001) extends from a wye junction just east of Union Depot (RA-SPC-5225, RA-SPC-6907) in downtown Saint Paul to the 1935 White Bear Lake Depot (RA-WBC-0121). The historic property, originally built by the LS&M Railroad in 1868, is an approximately 11-mile segment of a 155-mile-long railroad corridor that ran from Saint Paul to Duluth’s port on Lake Superior in 1870. The Saint Paul & Duluth Railroad acquired the LS&M in 1877. In the 1880s, it made a number of improvements to the corridor, including constructing a new railroad roadway over portions of the original 1868 roadway. The Northern Pacific Railroad acquired the property in 1900 and operated it until the company merged with a number of other railroads to form the Burlington Northern in 1970. The Northern Pacific began removing tracks within the corridor in 1987 and RCRRA purchased approximately two-thirds of the segment in 1992 for future light rail transit use, converting much of the trackless railroad roadway into the Bruce Vento Regional Trail. Despite the presence of the trail and removal of metal rails, wooden ties, and ballast, approximately 84% of the segment retains the historic railroad roadway, ditches, and associated structures.

The LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment is eligible for inclusion in the National Register under Criterion A in the area of Transportation as an early segment of what became the primary rail connection between the navigable waterways of the Mississippi River and Lake Superior and as an important railroad connection between downtown Saint Paul and the summer tourism industry of White Bear Lake. The groups of visible remnants of the 1868 LS&M railroad roadway (XX-RRD-NPR002, XX-RRD-NPR003, and XX-RRD-NPR004) and the buried portions of the 1868 LS&M

---

railroad roadway are also eligible for inclusion in the National Register under Criteria C and D as examples of early railroad engineering in Minnesota from the mid-1860s to 1870 and for their potential to contribute to the following research areas: Pre-Industrial Transportation Landscapes and Railroad Spaces: 1858–1910; Initial, Pioneering, and Expansion Railroads: Engineering, Construction, and Ruination: 1858–1910; and Machines in the Garden: Railroads and Evidence of Environmental Change in Minnesota: 1858–1945.

The period of significance for the visible remnants of the 1868 LS&M railroad roadway begins in 1864 with the initial grading and construction and ends in 1868 with the completion of the Saint Paul and White Bear Lake Segment. However, the effective period of significance for the entire district ends in 1970 when the Burlington Northern was formed. These historic properties meet the registration requirements in the Railroad MPDF and the draft registration requirements in Supplement to Railroads in Minnesota, 1862–1956 (DRAFT). Although the rails and ties are no longer extant and two (2) noncontiguous portions of the historic corridor were destroyed after the period of significance, the evaluation demonstrates that 84% of the district maintains sufficient integrity to convey its significance. According to the evaluation, character-defining features include “the railroad roadway, grade separation structures, retaining walls, depots, exposed and buried portions of the 1868 railroad roadbed, and the overall sense of linearity emphasized by the setting, comprised of the adjacent land uses and [vegetation along] the edge of the railroad [right-of-way].”

LS&M Railroad Corridor Historic District: White Bear Lake to Hugo Segment (XX-RRD-NPR005)
The LS&M Railroad Corridor Historic District: White Bear Lake to Hugo Segment (XX-RRD-NPR005) extends from the White Bear Lake Depot (RA-WBC-0121) to downtown Hugo in Washington County. Similar to the Saint Paul to White Bear Lake segment immediately to its south, this historic property was built in 1868 and is an approximately 5.3-mile-long segment of a longer railroad corridor that reached Duluth’s port on Lake Superior in 1870. Beginning in 1887, the route between White Bear Lake and Duluth was regraded by the Saint Paul & Duluth Railroad. The corridor contains active rail line from White Bear Lake to south of 140th Street (approximately 4.5 miles). North of that point, the railroad roadway and ditches continue, but without metal rails, wooden ties, or ballast. Similar to the Saint Paul to White Bear Lake segment, the portion of the roadway without tracks serves as a recreational trail. The Hardwood Creek Regional Trail extends approximately 10 miles to the northern boundary of Washington County and is entirely within the LS&M railroad corridor.

The LS&M Railroad Corridor Historic District: White Bear Lake to Hugo Segment is eligible for inclusion in the National Register under Criterion A in the area of Transportation as an early segment of what would become the primary rail connection between the navigable waterways of the Mississippi River and Lake Superior. The period of significance begins in 1868 with the completion of the segment between White Bear Lake and Hugo and ends in 1970 when the Burlington Northern was formed. The historic property meets the registration requirements in the Railroad MPDF. Although the rails and ties are no longer extant, the corridor continues with the ditches and roadbeds serving as a recreational trail.

104 Mead & Hunt and Midwest Valley Archaeology Center, Phase II Evaluation: Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment, 168.
extant for a portion of the corridor, it retains sufficient integrity of location, design, materials, setting, feeling, and association to convey its historic significance. According to the evaluation, character-defining features include “the railroad roadway, depots [sic], at-grade signalized crossings, culvert, and the overall sense of linearity emphasized by the setting, comprised of the adjacent land uses and lack of vegetation between the railroad roadway and the edge of [the right-of-way].”

**Potential Effects**

The Project APE overlaps with the LS&M Railroad Corridor Historic District beginning 150 feet east of Payne Avenue in Saint Paul and continuing eastward and then northward through to the end of the BRT corridor in White Bear Lake. The dedicated BRT roadway would be located within the boundary of the LS&M: Saint Paul to White Bear Lake segment beginning at Arcade Street in Saint Paul and continuing until Beam Avenue in Maplewood; it would also be within the historic property boundary between County Road D and Buerkle Road in Maplewood.

Proposed physical changes within the LS&M Railroad Corridor Historic District boundary include construction of the dedicated BRT roadway, Bruce Vento Regional Trail, retaining walls, stormwater BMPs, linear stormwater BMPs, five (5) BRT stations, six (6) bridges, and one (1) park-and-ride facility. Proposed physical changes within the vicinity of both historic LS&M segments include construction of additional retaining walls, sidewalk and trail connections, stormwater BMPs, linear stormwater BMPs, three (3) BRT stations, one (1) bridge, and one (1) park-and-ride facility. Although changes outside the historic district boundary would not physically affect the district, the LOD may extend into the historic property boundary and above-ground structures may be visible from the historic property or otherwise impact traffic, access, and parking.

When not located within the LS&M Railroad Corridor Historic District, the BRT vehicles would operate within paved roadways either in mixed traffic or in dedicated BAT lanes. The proposed BRT corridor crosses under the Saint Paul to White Bear Lake Segment on Beam Avenue in Maplewood and over the Saint Paul to White Bear Lake Segment on Neid Lane in Saint Paul and on TH 61 on the border of Gem Lake and White Bear Lake. In White Bear Lake, north of the Whitaker Street Station, the proposed BRT corridor travels alongside both segments in mixed traffic and intersects with the White Bear Lake to Hugo Segment at grade. Although in most cases the BRT vehicles would operate in either mixed traffic or in dedicated BAT lanes on existing paving, in limited areas paving would be repaired using mill and overlay or widened to accommodate the dedicated BAT lanes.

Small property acquisitions would occur near several BRT stations and in limited areas along the dedicated BRT roadway. Larger property acquisitions are proposed to accommodate potential stormwater BMPs, including near the Arcade Street and Maryland Avenue Stations, between Earl and Frank Streets, and near Gervais Avenue, Weaver Elementary School, and Beam Avenue. Therefore, in addition to the physical effects within the boundaries of the Saint Paul to White Bear Lake Segment, potential Project effects to both LS&M segments include visual effects of the proposed stations; and potential changes in traffic, access, and parking during Project construction.

---

106 Chris Hommerding, “Lake Superior & Mississippi Railroad Corridor Historic District: White Bear Lake to Hugo Segment (XX-RRD-NP005),” 38. Because the Hugo depot is nonextant, the White Bear Lake Depot is the only depot that can contribute to the White Bear Lake to Hugo Segment; the depot also contributes to the Saint Paul to White Bear Lake Segment and is located outside the APE.
Assessment of Effects

Physical

The proposed construction of the dedicated BRT roadway, BRT stations, bridges, park-and-rides, stormwater BMPs, and other Project elements, as described below, would have a permanent physical effect on the integrity of location (horizontal and vertical alignment), design, and materials of the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment and, therefore, would also impact the segment’s integrity of feeling and association. Because railroad tracks and railroad support buildings have been removed from the majority of the segment, continued integrity of design, materials, and setting is critical to maintaining the resource’s eligibility for listing on the National Register.\textsuperscript{107}

Construction of the Project would not physically affect the White Bear Lake to Hugo Segment or diminish the segment’s integrity of location, design, materials, or workmanship.

Dedicated BRT Roadway

Two Project documents describe the proposed physical changes that the dedicated BRT roadway would create within the historic property boundary, currently occupied by the Bruce Vento Regional Trail. The Visual Resource Memorandum describes the appearance of the proposed dedicated BRT roadway as “much like a typical roadway, with an asphalt, bituminous or concrete surface, as well as curbs and gutters.”\textsuperscript{108} The memorandum further notes that the visual contrast compared to existing conditions would be mostly “moderate” or “high” beginning at Arcade Street in Saint Paul and continuing through to Beam Avenue in Maplewood.\textsuperscript{109} To help mitigate the environmental effect of the dedicated BRT roadway, the memorandum notes that public input was sought to develop the \textit{Ramsey County Rail Right-of-Way Design Guide}. That document presents five (5) guiding principles, including: “Consider impacts to the historic character of the former rail corridor, minimize impacts to existing landscape and enhance the Ramsey County rail right-of-way with ecologically beneficial, resilient, seasonally diverse and low maintenance vegetation.”\textsuperscript{110} As it is incorporated into design development, the \textit{Ramsey County Rail Right-of-Way Design Guide} may help preserve the historic property’s sense of linearity. However, the railroad roadway as it appeared at the end of its period of significance would be dramatically changed.

The railroad roadway has been modified throughout its history, including substantial modifications in the 1880s when it was increased to a double-track, minor modifications when it was reduced to a single track after 1961, when the tracks were removed in beginning in 1987, and additional minor modifications after 1992 when Ramsey County converted it to trail use.\textsuperscript{111} Throughout the period of significance, users have experienced the railroad roadway as a single, linear corridor with one (1) or two (2) railroad tracks. Today, it is a paved trail on the railroad roadbed (see Figure 29).

\textsuperscript{107} Schmidt, Vermeer, Bradley, and Pratt, “Railroads in Minnesota, 1862–1956,” National Register of Historic Places Multiple Property Documentation Form, 198. See the section on Visual Effects, for more information on the Project’s potential impact on the historic property’s setting.
\textsuperscript{110} Ramsey County Regional Railroad Authority, \textit{Ramsey County Rail Right-of-Way Design Guide}, 2.
Proposed construction within the right-of-way between Johnson Parkway and Beam Avenue would alter the railroad roadway, increasing the existing roadbed’s width and the appearance of existing fills, cuts, and ditches (see Sheets 53, 54, and 56 of the 15% Plans). The new 12-foot-wide trail (a shared-use path) would have a different horizontal alignment than the existing trail and would be separated from the 26-foot-wide dedicated BRT roadway with a vegetated buffer (see Figure 30).

As noted in the Railroad MPDF, “[a]t minimum, a railroad corridor historic district includes a railroad roadway” and “must retain integrity of location, design and materials.” The location of the railroad roadway overall would not change under the Project, as it would still be within the historic district’s

---

112 Image is taken from SRF Consulting Group, Inc., “Visual Resources Memorandum, Draft,” Figure 12.
113 Image is taken from Ramsey County Regional Railroad Authority. Ramsey County Rail Right-of-Way Design Guide, Figure 42.
boundary. However, the horizontal and vertical alignment of the roadbed would be modified. Because the tracks have already been removed from the majority of the Saint Paul to White Bear Lake Segment, the Railroad MPDF places emphasis on the design and material integrity of the railroad roadway as defined by the modified ground, including the railroad bed, fills or cuts, and ditches. Substantial ground disturbance is proposed that would affect the railroad roadway’s remaining integrity of design and materials to such an extent that users may no longer recognize it as a railroad corridor despite its continued linear nature. Design review is not likely to avoid or significantly minimize adverse effects due to the width needed to accommodate both the BRT guideway and the new trail. Construction within the corridor would create physical impacts to historic materials, features, and spatial relationships that would not be reversible. In addition, although it might be possible to design the Project to avoid physical effects to two (2) of the 1868 roadway remnants (XX-RRD-NPR002 and XX-RRD-NPR003; see Figure 31 and Figure 32), modifications to the roadway to accommodate the Weaver Trail Underpass would likely physically impact the 1868 roadway remnant there (XX-RRD-NPR004; see Figure 33).

**Figure 31. Proposed Project Plans in the vicinity of the 1868 Alignment of LS&M Railroad between County Road C and Gervais Avenue (XX-RRD-NPR003).**

---

115 Images are approximately aligned for illustrative purposes. The image on the left is from Vicki Twinde-Javner, “1868 Alignment of Lake Superior & Mississippi Railroad between County Road C and Gervais Avenue (XX-RRD-NPR003),” Minnesota Individual Property Inventory Form.
Figure 32. Proposed Project Plans in the vicinity of the 1868 Alignment of the LS&M Railroad between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002).\textsuperscript{116}

\textsuperscript{116} Images are approximately aligned for illustrative purposes. The image on the left is from Vicki Twinde-Javner, “1868 Alignment of the Lake Superior & Mississippi Railroad between Kohlman Avenue and Beam Avenue (XX-RRD-NPR002),” Minnesota Individual Property Inventory Form.

Figure 33. Proposed Project Plans in the vicinity of the 1868 Alignment of the LS&M Railroad between Eldridge Avenue East and County Road B East (XX-RRD-NPR004).\textsuperscript{117}

\textsuperscript{117} Images are approximately aligned for illustrative purposes. The image on the left is from Vicki Twinde-Javner, “1868 Alignment of the Lake Superior & Mississippi Railroad between Eldridge Avenue E and County Road B E (XX-RRD-NPR004),” Minnesota Individual Property Inventory Form.
BRT Stations
The following five (5) proposed BRT stations, including all or portions of associated station platforms and amenities, retaining walls, and sidewalk or trail connections, are within the historic boundary of the Saint Paul to White Bear Lake Segment:

- Cook Avenue Station (see Sheet 11 of the 15% Plans)
- Maryland Avenue Station (see Sheet 12 of the 15% Plans)
- Larpenteur Avenue Station (see Sheet 13 of the 15% Plans)
- Frost Avenue Station (see Sheet 14 of the 15% Plans)
- Highway 36 Station (see Sheets 17, 17A, 34, and 35 of the 15% Plans)

Platform and station design development is currently limited to the general location, layout, and size of the platform (see Sheet 80 of the 15% Plans for station platform layout within the historic district, Sheet 83 for a section of a typical platform, and Figure 34). The Cook Avenue Station is proposed in a portion of the historic district where the railroad roadway has already been destroyed and it would not impact the historic property’s integrity. The Maryland Avenue, Larpenteur Avenue, Frost Avenue, and Highway 36 Stations, however, are proposed at locations fully within the historic district boundary in areas where the historic property has good integrity.

Figure 34. Visualization of typical station, trail, and dedicated BRT roadway.\textsuperscript{118}

\textsuperscript{118} Image is taken from SRF Consulting Group, Inc., “Visual Resources Memorandum, Draft,” Figure 1.
Although the platforms for the Buerkle Road and Whitaker Street Stations would be outside the district boundaries, the LOD for those stations would be immediately adjacent to or partially within the historic district boundary in areas where the historic property’s integrity has already been compromised.

While the Railroad MPDF does not discuss how the construction of new buildings, structures, and objects within a railroad corridor historic district’s boundaries affects integrity, the introduction of BRT stations would affect the property’s integrity of feeling. Depending on the placement and design of individual stations, the construction could also affect the historic property’s integrity of design and materials. While reviewing individual stations for design in accordance with the SOI Standards and developing construction protection measures to avoid unintended damage from construction activities may minimize impacts to the historic properties, these conditions would be unlikely to entirely avoid adverse effects.

**Bridges**

The following six (6) bridges, including associated retaining walls and sidewalk or trail connections, are proposed within the historic boundary of the Saint Paul to White Bear Lake Segment:

- Arcade Street Ramp (see Sheets 9, 47, and 48 of the 15% Plans)
- Johnson Parkway Bridge (see Sheets 11 and 52 of the 15% Plans)
- Gateway Trail Underpass (see Sheet 15 of the 15% Plans)
- Weaver Trail Underpass (see Sheet 15 of the 15% Plans)
- Highway 36 Bridge (see Sheets 16 and 55 of the 15% Plans)
- Fitch/Barclay Trail Underpass (see Sheet 18 of the 15% Plans)

Bridge design development is currently limited to location and general size. The Arcade Street Ramp is proposed in a portion of the historic district where the railroad roadway has already been destroyed and it would not impact the historic property’s integrity. The Johnson Parkway Bridge and the Highway 36 Bridge are both proposed in locations where bridges previously existed. Bridges did not previously exist at the Gateway State Trail or at the trails at Weaver Elementary School and Fitch Road/Barclay Street.

Although the I-694 Bridge would be outside the historic district and is discussed as a visual effect, below, the LOD is within the historic property boundary (see Sheets 21 and 60 of the 15% Plans).

While the Railroad MPDF does not discuss how the construction of new grade-separation structures within a railroad corridor historic district’s boundaries affects integrity, construction of the three (3) trail underpasses and the I-694 Bridge would affect the historic property’s integrity of location (vertical and horizontal alignment of the roadbed), design, materials, and feeling. In addition, the Weaver Trail Underpass would physically impact the 1868 roadway remnant there (XX-RRD-NPR004). If appropriately designed, the Johnson Parkway Bridge and the Highway 36 Bridge may have minimal effect on the overall integrity of the historic district; however, construction would impact intact historic roadways in these areas and change the vertical alignment of the roadbed. Reviewing all of the proposed bridges for design in accordance with the SOI Standards and developing construction protection measures to avoid unintended damage from construction activities may minimize impacts to historic properties. However, these conditions would be unlikely to avoid adverse effects entirely.
Park-and-Ride Facility

The proposed Highway 36 park-and-ride would be located adjacent to the Saint Paul to White Bear Lake Segment near Harvest Park (see Figure 35 and Sheets 17, 18, 34, and 35 of the 15% Plans). The 300-space structure would serve transit riders and provide some additional parking for users of Harvest Park and the Bruce Vento Regional Trail. Although design development has not progressed sufficiently to determine how much of the structure would ultimately be within the historic district boundaries, ground disturbance for construction and connections to the Highway 36 Station would extend into the historic property. The proposed location is approximately 950 feet south of an 1868 roadway remnant (XX-RRD-NPR003) and would not physically impact it.

Figure 35. Proposed Project Plans in the vicinity of the Highway 36 Park-and-Ride Facility. LS&M Railroad Corridor Historic District boundaries outlined in blue.

Maplewood’s first comprehensive plan was developed in 1972 and identified a portion of what is now known as Harvest Park (RA-MWC-0263) as public space to be set aside for open space and recreation. The land appears to have been in agricultural use prior to the park’s establishment, and no structures are visible in available aerial photographs (see Figure 36). Construction in this open space would therefore introduce a structure where there was none during the period of significance.

---

The Rush Line BRT Project is considering a Build Alternative with the park-and-ride structure and a Build Alternative option without the park-and-ride. See Section 2.3.3 of the Environmental Assessment: Rush Line Bus Rapid Transit Project, DRAFT, dated September 2020.
Figure 36. Harvest Park. The land that became Harvest Park is shown in aerial photographs from (left to right) 1940, 1974 (just after the period of significance for the LS&M Railroad Corridor Historic District), and 2018. The blue arrow in the 2018 image points to the location of the proposed Highway 36 park-and-ride.\(^{120}\)

While the Railroad MPDF does not discuss how the construction of new buildings, structures, and objects within or adjacent to a railroad corridor historic district’s boundaries affects integrity, the introduction of a structured park-and-ride in this location would impact the historic property’s integrity of design, materials, and setting through the physical impact of construction. While reviewing the design in accordance with the SOI Standards may minimize this impact, it is unlikely to avoid adverse effects entirely due to the introduction of a building in a previously open setting.

**Stormwater BMPs**

Two areas within the historic property boundaries include proposed stormwater BMPs:

- Near Arcade Street (see Sheet 9 of the 15% Plans)
- Near Nebraska Avenue (see Sheet 13 of the 15% Plans)

Project plans currently depict potential stormwater BMP locations as blue stars in approximate locations. The size, depth, and design of the BMPs will be informed by stormwater analysis currently underway. In some cases, the stormwater BMP locations may be removed from consideration.

Depending on the placement and design of the stormwater BMP, construction could affect the historic property’s integrity of design, materials, and feeling. However, because the area between the railroad roadway and the edge of the railroad right-of-way historically was overgrown with vegetation, reestablishing vegetation as part of design development and/or reviewing the stormwater BMP design in accordance with the SOI Standards may minimize or avoid potential adverse effects due to this Project element.\textsuperscript{121}

**Visual**

The construction of BRT stations, a bridge, and stormwater BMPs, as described below, has the potential to have a permanent visual effect on the historic setting of the LS&M Railroad Corridor Historic District segments.\textsuperscript{122} Because the majority of the Saint Paul to White Bear Lake Segment has already lost railroad tracks and railroad support buildings, continued integrity of setting (in addition to integrity of design and material) is critical to maintaining eligibility for listing on the National Register.\textsuperscript{123}

Three (3) BRT stations, including dedicated BRT lanes, medians, retaining walls, and station platforms and amenities, would be visible from the LS&M railroad Corridor Historic District: Saint Paul to White Bear Lake Segment:

- arcade street station: approximately 330 feet north
- buerkle road station: approximately four (4) feet east
- whitaker street station: approximately six (6) feet east

The I-694 Bridge would be built immediately adjacent to the historic property boundary. The bridge is located near Bridge 62822 (RA-WBC-0156, contributing), an existing railroad bridge carrying the Bruce Vento Regional Trail over the Interstate (see Sheets 29 and 60 of the 15% Plans). Bridge 62822 and the current Bruce Vento Regional Trail in this area are both proposed to remain in place as part of the Project. However, the new I-694 Bridge would be visible from the historic district, including from the contributing bridge.

No BMPs are located near or adjacent to the White Bear Lake to Hugo Segment. The following potential BMP locations are immediately adjacent to or within view of the Saint Paul to White Bear Lake Segment:

- Near Payne Avenue on either side of the historic property (see Sheet 8 of the 15% Plans)
- Between Earl Street and the Cook Avenue Station, in a portion of the historic property that no longer has integrity (see Sheets 10 and 11 of the 15% Plans)
- North of Maryland Avenue Station, east of the historic property (see Sheet 12 of the 15% Plans)
- South of Frost Avenue, east and west of the historic property (see Sheet 14 of the 15% Plans)
- Near the Weaver Trail Underpass, west of the historic property (see Sheet 15 of the 15% Plans)
- South of County Road B East, east of the historic property (see Sheet 16 of the 15% Plans)
- North of TH 36, west of the historic property (see Sheet 16 of the 15% Plans)

\textsuperscript{121} Schmidt, Vermeer, Bradley, and Pratt, “Railroads in Minnesota, 1862–1956,” National Register of Historic Places Multiple Property Documentation Form, 186.

\textsuperscript{122} The County Road E park-and-ride facility and the Payne Avenue, St. John’s Boulevard, County Road E, Cedar Avenue, and Downtown White Bear Lake Stations would not be visible from the historic property, or would be minimally visible due to distance and intervening buildings and vegetation.

Near the Highway 36 Station, west of the historic property (see Sheets 17 and 17A of the 15% Plans)
- South of Beam Avenue, west of the historic property (see Sheet 18 of the 15% Plans)
- Between County Road D and I-694, east of the historic property (see Sheet 21 of the 15% Plans)
- South of Buerkle Avenue, east of the historic property (see Sheet 21 of the 15% Plans)
- Near the TH 61 bridge over the historic property, east of the historic property (see Sheet 24 of the 15% Plans)
- North of Goose Lake, east of the historic property (see Sheet 26 of the 15% Plans)

Although these potential stormwater BMPs are outside the historic district’s boundaries, the removal and reintroduction of vegetation, and the grading of the landscape all have the potential to have a permanent visual effect on the historic property. As noted above, the size, depth, and design of the BMPs will be informed by stormwater analysis that is currently underway; in some cases, the stormwater BMP locations may be removed from consideration.

Introduction of the Arcade Street, Buerkle Road, and Whitaker Street Stations, the I-694 Bridge, and the above-referenced potential stormwater BMPs has the potential to diminish the Saint Paul to White Bear Lake Segment’s integrity of setting. Through design development, screening could be established or reestablished between some Project elements and the historic property. For example, vegetative screening could be incorporated into BMP design, where appropriate. Reviewing the design of Project elements in accordance with the SOI Standards may also minimize and/or avoid potential adverse effects. This review, most appropriate for the BRT stations and the I-694 Bridge, would need to include minimizing the mass, scale, and visibility of Project elements from the historic property’s viewshed and the establishment or reestablishment of appropriate screening as design development continues.

Traffic, Access, and Parking
The Bruce Vento Regional Trail is located within the historic boundary of the Saint Paul to White Bear Lake Segment between approximately Arcade Street in Saint Paul and I-694; for the majority of the route, the trail is located on top of the railroad roadbed. The Project would shift the location of the new trail within the historic district boundaries (see Dedicated BRT Roadway). The trail would be available for recreational use as it has been since its creation after 1992. North of I-694, the two (2) historic district segments serve as an active railroad corridor to just south of 140th Street in Hugo, Minnesota.

Although there are numerous proposed property acquisitions adjacent to the historic property boundary, the only permanent acquisition proposed within the historic property boundary is approximately 800 square feet for construction of a new sidewalk north of Buerkle Road. There are also temporary easements for construction of pedestrian improvements at Buerkle Road, along the west side of TH 61, and on the south side of 8th Street in White Bear Lake. Although construction may temporarily impact freight operations in the historic corridor, activities would be coordinated with the BNSF Railway Company. The new pedestrian crossing at Buerkle Road is not anticipated to affect freight rail

---

124 Small portions of the trail near Phalen Park in Saint Paul and near County Road D in Maplewood extend outside the historic boundary of the LS&M Railroad Corridor Historic District. Additionally, some portions of the trail are located elsewhere within the historic property boundary and not directly on top of the railroad roadbed.
operations due to the low volume of trains that use the track. Any properties impacted by temporary easements would “be restored to a condition that is comparable to its pre-construction use.”

New traffic signals would be introduced where the dedicated BRT roadway intersects Maryland Avenue, Larpenteur Avenue East, Frost Avenue, County Road B East, Cope Avenue East, Gervais Avenue, Beam Avenue East, County Road D, and Buerkle Road. Stop signs would be introduced where the dedicated BRT roadway intersects Arlington Avenue East, Idaho Avenue East, and Ripley Avenue. None of these signal modifications would impede access to the historic property.

Rush Line BRT traffic analysis identified queuing issues along TH 61 at County Road E, County Road 96, and 4th Street in White Bear Lake. However, the queuing issues can be minimized by extending turn lanes or adjusting transit signal priority parameters. None of the queuing issues would impair access to the historic property.

The Project would result in the loss of some on-street parking spaces near the Bruce Vento Regional Trail [including eight (8) spaces near the Larpenteur Avenue Station and 13 spaces near the Highway 36 Station under the Build Alternative option without the park-and-ride]. This loss of parking spaces is “not expected to adversely impact community facilities” or “affect community character and cohesion” in those areas. The proposed park-and-ride near the Highway 36 Station would improve access to the recreational trail.

Potential Project Effects to Overall Integrity and National Register-Eligibility

The Railroad MPDF indicates a railroad corridor historic district must include, at a minimum, a railroad roadway with integrity. It also notes that the district as a whole must retain, at a minimum, integrity of location, design, and materials. The Guidelines for Inventory and Evaluation of Railroads in Minnesota note that if a portion of a railroad corridor “has completely lost its integrity, such that there is no visible expression on the landscape, the railroad corridor has lost its ability to convey the operation of the railroad as a single transportation corridor.”

According to the historic property evaluation, the LS&M railroad roadway retains its alignment in approximately 9.25 miles of the 11-mile Saint Paul to White Bear Lake Segment (84%). Upon completion of the Project as proposed, the railroad roadway will retain approximately 5.2 miles of its alignment (47%). This includes approximately 1.1 miles between I-94 and Arcade Street at the southern end of the segment, approximately 0.5 miles between Beam Avenue and County Road D, and

---

128 Schmidt, Vermeer, Bradley, and Pratt, “Railroads in Minnesota, 1862-1956,” National Register of Historic Places Multiple Property Documentation Form, 198-201. Although the Railroad MPDF discusses seven (7) aspects of integrity for railroad corridor historic districts, it focuses the attention on location, design, and materials. It also notes that integrity of feeling and association is highly dependent on the other aspects of integrity and that workmanship is typically only present in individual railroad elements, such as stonework in a bridge abutment. The evaluations for the visible remnants of the 1868 LS&M railroad roadway note that they retain integrity of workmanship.
129 MnSHPO and MnDOT, Guidelines for Inventory and Evaluation of Railroads in Minnesota, 16.
130 Mead & Hunt and Midwest Valley Archaeology Center, Phase II Evaluation: Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment, 150. The evaluation provided this percentage as 85; the number is corrected in this report.
approximately 3.6 miles between I-694 and the White Bear Lake Depot at the northern end of the segment (See Figure 37). Although these distances will likely change as design development progresses, construction of the dedicated BRT guideway and paved trail will result in the remainder of the historic district no longer reading as a railroad corridor, leaving a substantial gap between the southern segment and the northern segments. As noted in the Guidelines for Inventory and Evaluation of Railroads in Minnesota, a railroad corridor historic district “cannot jump over this type of missing gap to connect railroad segments retaining integrity any more than a train traveling along a railroad corridor could jump such a gap.”

The diminishment of the Saint Paul to White Bear Lake Segment’s integrity of location, design, materials, setting, feeling, and association, along with the diminishment of integrity of workmanship at the visible remnants of the 1868 LS&M railroad roadway, could possibly render the Saint Paul to White Bear Lake Segment no longer eligible for inclusion in the National Register. The loss of integrity on this terminal segment will also diminish integrity of the entire LS&M mainline between Saint Paul and Duluth, resulting in the diminishment of the White Bear Lake to Hugo Segment’s integrity of association with the larger whole.

Because the LS&M Railroad is significant as the primary rail connection between the navigable waterways of the Mississippi River (at the port in Saint Paul) and Lake Superior (at the port in Duluth), the loss of the terminal segment’s integrity may also render the LS&M mainline no longer eligible for inclusion in the National Register. For railroads with significant connections between terminals, the Railroad MPDF emphasizes the importance of a railroad corridor’s integrity being intact “at least to the metropolitan area or urban center where the connection was made.” The Guidelines for Inventory and Evaluation of Railroads in Minnesota note that “a railroad corridor significant for the connections it once made does not retain historic integrity if the railroad segment providing connection to its significant terminal, transfer, or resource procurement area lacks historic integrity and if the portion lacking historic integrity is of sufficient length that the railroad corridor no longer approaches the area of significant connection.” Although White Bear Lake is considered part of the Twin Cities metropolitan area, rail lines reaching White Bear Lake could extend into either Minneapolis or Saint Paul (see Figure 38). The Project as proposed would substantially alter the LS&M’s significant approach to the port at the Mississippi River in Saint Paul.

131 MnSHPO and MnDOT, Guidelines for Inventory and Evaluation of Railroads in Minnesota, 16.
133 MnSHPO and MnDOT, Guidelines for Inventory and Evaluation of Railroads in Minnesota, 15-16.
Figure 37. Intact portions of the railroad roadway (in blue) following completion of project
Figure 38. Railroads in Minneapolis-Saint Paul Area. The rail lines that would eventually become the Northern Pacific are depicted in yellow. The LS&M Railroad Corridor Historic District is significant for its connection from Duluth to Saint Paul; the proposed Project would substantially alter the terminal connection between White Bear Lake and Saint Paul.\textsuperscript{134}

\textbf{Recommended Finding: Adverse Effect}

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have an Adverse Effect to the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment and the individually eligible 1868 Alignments of the LS&M Railroad (XX-RRD-NPR002, XX-RRD-NPR003, and XX-RRD-NPR004). Because the Saint Paul to White Bear Lake Segment also serves as the terminal segment for the entire LS&M Railroad Corridor from Saint Paul to Duluth, the Adverse Effect also applies to the White Bear Lake to Hugo Segment and the larger historic railroad corridor to Duluth. Construction of the Project would directly and physically alter the characteristics that qualify the Saint Paul to White Bear Lake Segment for inclusion in the National Register by diminishing its integrity of design and materials. The Project would extensively alter the railroad bed’s width and the appearance of existing fills, cuts, and ditches through regrading and widening of the roadbed and the introduction of a paved roadway, stations, bridges, and other Project elements. Minimization of this adverse effect is unlikely to be accomplished through design review in a way that also meets the Project’s purpose and need. In addition, the construction of some Project elements within the viewshed of the corridor could diminish integrity of setting, feeling, and association. Although conditions could be placed on the design of...

\textsuperscript{134} Image from Schmidt, Vermeer, Bradley, and Pratt, “Railroads in Minnesota, 1862-1956,” National Register of Historic Places Multiple Property Documentation Form, Maps.
various Project elements to minimize visual effects, the entire BRT Corridor beginning at the Arcade Street Station and continuing through the Whitaker Street Station would be subject to design review. It may not be possible to avoid physical effects to each of the 1868 Alignments of the LS&M Railroad. Due to the substantial physical changes proposed in the corridor and the extensive review required to minimize visual effects, resolution of all Adverse Effects to resources associated with the LS&M Railroad will be most effectively accomplished through continued consultation under Section 106 of the National Historic Preservation Act.

Theodore Hamm Brewing Company Complex (RA-SPC-2926)
Minnehaha Avenue East between Payne Avenue & Stroh Drive, Saint Paul

Description & Historic Significance
The Theodore Hamm Brewing Company (Hamm’s Brewing Company) Complex was constructed from circa 1865 to 1978. The buildings are generally clad in brick and range from one (1) to eight (8) stories in height. Associated structures include a pump house, tunnels, skyways, a silo, a shavings vault, a retaining wall, and a bridge. The brewery was established in 1865 and grew to become the largest brewery in Minnesota. The brewery expanded and modernized several times since its initial construction to successfully incorporate scientific and technological advancements within the brewing industry. For three (3) successive generations, the brewery was passed down from father to son, with leadership remaining in the Hamm family. The brewing complex consists of 28 contributing resources and 10 noncontributing resources (see Figure 39). However, only one (1) noncontributing resource is partially located within the Rush Line BRT APE: Rail Shipping and Storage, Building No. 65, built in 1965.

The Hamm’s Brewing Company Complex is eligible for inclusion in the National Register under Criteria A in the area of Industry and under Criteria B for association with Theodore Hamm, William Hamm Sr., and William Hamm Jr. The period of significance begins in 1865, representing the earliest construction, and ends in 1952, when leadership shifted outside of the Hamm family and the company expanded outside of the St. Paul plant. Overall, the Hamm’s Brewing Company Complex retains sufficient integrity of materials, design, workmanship, location, and feeling to convey its historic significance. Since the period of significance, there have been changes to the land use north of the Complex. During the period of significance, the area was a railroad corridor lined with industrial properties. However, portions of the LS&M Railroad were removed in the 1990s, and Phalen Boulevard was completed in 2001, diminishing the setting and association of Hamm’s Brewing Company with the railroad industry and industry. The Hamm’s Brewing Company Complex’s relationship to the topography and the surrounding properties is intact at the southwest corner of the property near Swede Hollow. Character-defining features include the brick cladding that visually links the complex’s resources, the melding of old and new buildings within the complex for modernization purposes, topography, and relationship to nearby fresh water sources.

Information on the Theodore Hamm Brewing Company Complex comes from Katie Ohland, “Theodore Hamm Brewing Company Complex (RA-SPC-2926),” Minnesota Multiple Property Inventory Form, 2019; and Diane Trout-Oertel, “Theodore Hamm Brewing Company,” National Register of Historic Places Registration Form, 2005. Underground tunnels and pipe systems have not been separately inventoried. If future ground disturbance is proposed within the complex boundaries, additional survey and evaluation of these underground resources may be necessary.
Potential Effects
The proposed Project includes operation of BRT vehicles within existing paved roadways along Phalen Boulevard and Neid Lane, north of Hamm’s Brewing Company Complex (see Sheets 8 and 9 of the 15% Plans and Figure 40). The Project would not have any direct physical effects to any of the contributing resources. However, as noted on the 15% Plans, the proposed physical changes in the vicinity of the historic property include the proposed Payne Avenue and Arcade Street Stations, sidewalk connections, and proposed BMPs, all of which are on the opposite side of Phalen Boulevard from the historic

137 Based on analysis of aerial photographs and Google Street View, resources numbered 1, 11, 20, 26, 27, and 39 are nonextant and are not depicted on this map. These were outside the survey area for the Rush Line BRT Project.
property. Small partial property acquisitions would occur near both stations and, in limited areas, existing paving would be repaired using mill and overlay. Therefore, potential Project effects include visual effects of the proposed stations and potential changes in traffic, access, and parking.

**Figure 40. Proposed Project plans within the vicinity of Hamm’s Brewing Company Complex (approximate historic property boundary outlined in blue).**

Assessment of Effects

Physical

As currently designed, the proposed Project would not directly, physically affect any of the historic resources associated with the Hamm’s Brewing Company Complex. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual

The proposed Payne Avenue Station would be located 360 feet northwest of the Hamm’s Brewing Company Complex’s northern boundary, and the Arcade Street Station would be 925 feet northeast. Both stations would be on the opposite side of the StPS&TF/Omaha Road Railroad Corridor Historic District (XX-RRD-CNW001) and Phalen Boulevard. Construction of these two (2) station areas would

---

138 Image based on 15% Plans combined with an aerial photograph from Ramsey County, “Ramsey County Interactive Property Map,” MapRamsey, 2018, [https://maps.co.ramsey.mn.us/MapRamsey/](https://maps.co.ramsey.mn.us/MapRamsey/) (accessed on August 20, 2020).
include dedicated BRT lanes, station platforms, and amenities. Proposed BMPs are located within the Eastside Heritage Park and between Phalen Boulevard and the StPS&TF/Omaha Road Railroad Corridor Historic District. The construction of these Project elements has the potential to have a permanent visual effect on the historic property’s setting. However, the addition of Project elements would be largely consistent with the current visual context of the historic property, which has changed since the end of the historic property’s period of significance (see Figure 41). Historically, this corridor was filled with railroad infrastructure and industrial buildings. The removal of a portion of the LS&M Railroad Corridor and industrial properties and the introduction of Phalen Boulevard (a multi-lane roadway) has already diminished the Hamm’s Brewing Company Complex’s integrity of setting and association. The construction of BAT lanes and BRT stations would be a minor addition to this altered setting and would not diminish the historic property’s integrity of setting, feeling, or association any further.

Figure 41. Hamm’s Brewing Company Complex. The approximate boundary of the Hamm’s Brewing Company Complex in 1953 (left) immediately following the end of its period of significance (1952) and in 2018 (right) following extensive modifications north of the Complex due to the removal of the LS&M Railroad Corridor and introduction of both Phalen Boulevard and the Eastside Heritage Park.\(^{139}\)

Traffic, Access, and Parking

The proposed Project would not physically affect access to the Hamm’s Brewing Company Complex. Although traffic queuing concerns have been identified at Neid Lane and Arcade Street, the Project incorporates improvements and the queuing issues can be minimized through adjustments in signal

---

Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

timing.\textsuperscript{140} There would be minimal to no changes to traffic signals at the Phalen Boulevard intersection with Payne Avenue. New traffic signals are proposed at Phalen Boulevard’s intersections with Neid Lane and Arcade Street. None of these signal modifications would impede access to the historic property. The Project is not expected to impact parking near this historic property.\textsuperscript{141}

\textit{Recommended Finding: No Adverse Effect}\n
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have \textbf{No Adverse Effect on the Theodore Hamm Brewing Company Complex}. The historic property would not be physically affected by the Project. Although a few Project elements may be visible from the northern edge of the historic boundary, any alterations to the viewshed would be minor and the views to and from the historic property would not be changed. The setting has been altered previously with the construction of Phalen Boulevard and the proposed Project elements would not diminish this altered setting any further. Therefore, the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

3M Administration Building (RA-SPC-0455)
777 Forest Street, Saint Paul\textsuperscript{142}

\textit{Description & Historic Significance}\n
The 3M Administration Building (also known as Building 21; Headquarters Building) was the corporate headquarters building of the Minnesota Mining and Manufacturing Company (3M) Main Plant in Saint Paul.\textsuperscript{143} The 3M Administration Building is a two (2)-story Moderne style office building constructed in 1940 (Figure 42). The building is associated with the rise of 3M into a national and international leader in the development, manufacture, marketing, and distribution of abrasive and adhesive products, which have had a lasting impact on the development of the United States. The building was designed by renowned industrial architect Albert Kahn with local architects Toltz, King, and Day.

\textsuperscript{142} Please note: the address of the 3M Administration Building was erroneously noted as 900 Bush Avenue in correspondence from FTA to MnSHPO and consulting parties dated July 10, 2020. That address is the overall address of the 3M Main Plant Historic District (RA-SPC-0449).
\textsuperscript{143} Information on the 3M Main Plant, Building 21 comes from Katie Ohland, “3M Administration Building (RA-SPC-0455),” Minnesota Multiple Property Inventory Form, 2019; and Andrew J. Schmidt, Marjorie Pearson, and Renee L. Hutter, “3M Administration Building,” National Register of Historic Places Registration Form, 2014.
The 3M Administration Building was listed in the National Register in 2015. It is significant at the national level under Criterion A for its association with the history and development of the 3M Company during its rise to international prominence in the areas of Commerce, Industry, and Invention. It is also locally significant under Criterion C in the area of Architecture, as it is a distinctive example of the Moderne style of the 1930s and 1940s. The building was once a contributing resource within the 3M Main Plant Historic District (RA-SPC-0449), but the district is no longer eligible for inclusion in the National Register due to large-scale demolitions and lack of integrity. The period of significance for the 3M Administration Building spans from its construction in 1940 to 1962, when the 3M corporate headquarters were relocated. Overall, the 3M Administration Building retains sufficient integrity of location, materials, design, workmanship, and feeling to convey its significance. Since the period of significance, there have been changes to the land use north of the historic property and other buildings associated with 3M have been demolished, both impacting its integrity of setting and association. Character-defining features include features of the Moderne style, including the rectangular plan, multiple stories, flat roof, symmetrical wings, recessed window openings that are grouped vertically, and the juxtaposition of limestone and granite materials.

Potential Effects
The proposed Project includes operation of BRT vehicles on a newly constructed dedicated BRT roadway approximately 425 feet north of the historic property (see Sheet 9 of the 15% Plans and Figure 43). The Project would not have any direct physical effects to the historic property. However, as noted on the 15% Plans, the proposed physical changes in the vicinity of the historic property include construction of the Arcade Street Station, Bruce Vento Regional Trail, sidewalk connections, and the Arcade Street Ramp. All of these proposed Project elements are on the opposite side of Phalen Boulevard from the historic property. In limited areas, existing paving on Phalen Boulevard would be repaired using mill and overlay. Therefore, potential Project effects include visual effects of the proposed station and Arcade Street Ramp, and potential changes in traffic, access, and parking.

144 Image from Schmidt, Pearson, and Hutter, “3M Administration Building,” National Register of Historic Places Registration Form.
Figure 43. Proposed Project plans within the vicinity of the 3M Administration Building (approximate historic property boundary outlined in blue).\textsuperscript{145}

Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect the 3M Administration Building. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
The proposed Arcade Street Ramp and dedicated BRT roadway would be approximately 425 feet from the 3M Administration Building, on the opposite side of the StPS&TF/Omaha Road Railroad Corridor District (XX-RRD-CNW001) and Phalen Boulevard (see Sheet 9 of the 15% Plans). The Arcade Street Station is farther north, on the opposite side of Arcade Street. Construction of the Arcade Street Ramp, Bruce Vento Regional Trail, and dedicated BRT roadway have the potential to have a permanent visual effect on the historic property’s setting. However, the addition of Project elements would be largely consistent with the current visual context of the historic property, which has changed since the end of the historic property’s period of significance. Historically, the space north of the historic property was filled with 3M Main Plant buildings. The removal of those buildings and the construction of Phalen Boulevard has already diminished the 3M Administration Building’s integrity of setting and association. Due to the distance and visual obstructions between the Arcade Street Station and the historic property, the BRT station would have no visual effect on the 3M Administration Building. The construction of the

\textsuperscript{145} Image based on 15% Plans combined with an aerial photograph from Ramsey County, “Ramsey County Interactive Property Map,” MapRamsey, 2018, \url{https://maps.co.ramsey.mn.us/MapRamsey/} (accessed on August 20, 2020).
Arcade Street Ramp and dedicated BRT roadway would be minor additions to the already altered setting and would not diminish the historic property’s integrity of setting, feeling, or association any further.

Traffic, Access, and Parking
The proposed Project would not physically affect access to the 3M Administration Building. Although traffic queuing concerns have been identified along at Neid Lane and Arcade Street, the Project incorporates improvements and the queuing issues can be minimized through adjustments in signal timing. New traffic signals are proposed at Phalen Boulevard’s intersections with Arcade Street and Mendota Circle. None of these signal modifications would impede access to the historic property. The Project is not expected to impact parking near this historic property.

Recommended Finding: No Adverse Effect
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect on the 3M Administration Building. The historic property would not be physically affected by the Project. Although a few Project elements may be visible from the northern edge of the historic boundary, any alterations to the viewshed would be minor and the views to and from the historic property would not be changed. The setting has been altered previously with the construction of Phalen Boulevard and the proposed Project elements would not diminish this altered setting any further. Therefore, the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

Phalen Park (RA-SPC-10850)
1600 Phalen Drive, Saint Paul

Description & Historic Significance
Phalen Park (now known as Phalen Regional Park) consists of 278 acres of parkland with Lake Phalen as its centerpiece. Although it is largely located within the city of Saint Paul, a portion of the park extends north of Larpenteur Avenue East into the adjacent city of Maplewood. Phalen Park was developed beginning in 1892 and refurbished in 1906, 1935, and 1969, each refurbishment representing different philosophies in recreation and park design. Amenities now include a golf course, recreation center, playing fields, beach house, activity center, and a picnic pavilion. The National Register evaluation identified numerous contributing and noncontributing resources throughout the park; however, only four (4) are located within the Rush Line BRT APE (see Figure 44):

- Bruce Vento Regional Trail (RA-SPC-11121, noncontributing)
- Phalen Park Pedestrian and Bicycle Trails (RA-SPC-11122, contributing)
- East Shore Drive (RA-XXX-001, contributing)
- Johnson Parkway (RA-SPC-8497 & RA-SPC-5685, contributing)

Phalen Park is also an integral component of Saint Paul’s Grand Round (RA-SPC-11142) park system. Proposed by landscape architect Horace William Shaler Cleveland in the late 19th century, the Grand

---

148 Information on Phalen Park comes from Katie Ohland and Chris Hommerding, “Phalen Park (RA-WBC-10850),” Minnesota Multiple Property Inventory Form, 2020.
Round is comprised of a series of large parks connected by parkways. Phalen Park is connected to Como Park to the west via Wheelock Parkway (RA-SPC-5679) and to Indian Mounds Park to the south via Johnson Parkway (RA-SPC-8497 & RA-SPC-5685).  

**Figure 44. From left to right, East Shore Drive (RA-XXX-001) and the Bruce Vento Regional Trail (RA-SPC-11121) east of Phalen Park, view looking northeast.**

Phalen Park is eligible for individual inclusion in the National Register under Criterion A in the areas of Entertainment/Recreation and Community Planning and Development and under Criterion C in the area of Landscape Architecture. Phalen Park is significant for its association with Saint Paul's attempts to create and provide parks and recreation for citizens. Additionally, it represents the historical evolution of landscape architecture and park design. The effective period of significance spans from the first acquisitions of land in 1892 to the end of the last major wave of construction in 1978. Despite some modifications since the end of the period of significance, including a wetland restoration project, restoration of Lake Phalen’s shoreline, construction of a pavilion, and installation of the Hmong Heritage Wall and the *Meditation* sculpture, the historic property retains all seven (7) aspects of integrity.

---

149 Saint Paul’s Grand Round has never been fully evaluated for inclusion in the National Register. Because the Project APE overlaps only with Phalen Park and Johnson Parkway, which have both been fully evaluated in recent years, FTA determined that an evaluation of the entire park system was not necessary to adequately consider Project effects on historic properties. This assessment of effects considers Project effects on both Johnson Parkway and Phalen Park within the context of their historical association to the larger Saint Paul Grand Round.

150 Image from Ohland, Katie, and Chris Hommerding, “Phalen Park (RA-WBC-10850),” Minnesota Multiple Property Inventory Form, Figure 2.

151 Although Criteria Consideration G for properties under 50 years of age would typically apply to this period of significance, it is anticipated the majority of the resources associated with the historic property will reach 50 years of age by the time the Rush Line BRT Project is completed. Given current academic analysis, it is likely the third refurbishment of the Park will be considered significant once it reaches 50 years of age without needing to make a case for exceptional significance. Therefore, FTA is treating Phalen Park’s period of significance as ending in 1978 for the purposes of the Project. Should a National Register nomination proceed prior to 2028, additional comparative analysis may be necessary pursuant to Criteria Consideration G.
Character-defining features near the Project area include the naturally forested lakeshore and pedestrian and automobile paths and roadways.

**Potential Effects**

Phalen Park is located within the Project APE and within the LOD (see Figure 45). The proposed dedicated BRT roadway is adjacent to Phalen Park’s southeast boundary. Proposed physical changes within the historic property are limited to a trail connection to the noncontributing Bruce Vento Regional Trail (RA-SPC-11121). Proposed physical changes in the vicinity of the historic property include construction of the dedicated BRT roadway, Bruce Vento Regional Trail, retaining walls, linear stormwater BMPs, and the Maryland Avenue Station. In addition, land would be acquired for a potential stormwater BMP location north of the Maryland Avenue Station. The Project proposes visual changes to the property’s southern entrance through the construction of the Johnson Parkway Bridge. Therefore, in addition to the potential physical effect to Phalen Park, potential Project effects include visual effects of the proposed station, bridge, and dedicated BRT roadway in the vicinity of the historic property and potential changes in traffic, access, and parking.

**Figure 45. Proposed Project plans within the vicinity of Phalen Park (approximate historic boundary outlined in blue).**
Assessment of Effects

Physical
Although the proposed Project would have a direct, physical effect to the historic property, the effect would be minor. Within the historic property boundaries, a trail connection would be reconstructed between the noncontributing Bruce Vento Regional Trail and the shifted location of the existing Bruce Vento Trail within the Ramsey County rail right-of-way (LS&M Railroad Corridor Historic District). Any potential physical or visual effects of this connection can be minimized and/or avoided through design development that ensures the new trail construction blends into the existing trail visually and materially. The LOD for this construction extends to East Shore Drive (RA-XXX-001), a contributing historic resource. Any potential adverse physical effects caused by unintended damage from construction activities can be avoided with construction protection measures incorporated into contract documents.

Visual
Directly adjacent to the southeast edge of the historic property boundaries, construction would include the dedicated BRT roadway, Bruce Vento Regional Trail, retaining walls, linear stormwater BMPs, and the Maryland Avenue Station. In addition, land would be acquired for a potential stormwater BMP location on the opposite side of the dedicated BRT roadway just north of Maryland Avenue East. Although all of these Project elements are outside Phalen Park’s historic property boundaries, the removal and reintroduction of vegetation, the grading of the landscape, the construction of Project elements, and the operation of the BRT service all have the potential to have a permanent visual effect on the historic property. However, these visual effects can be minimized and/or avoided through reestablishment of appropriate vegetative screening as design development continues.

Approximately 740 feet south of Phalen Park’s southern boundary, the proposed Johnson Parkway Bridge would carry the dedicated BRT roadway and the Bruce Vento Regional Trail over the historic Johnson Parkway (RA-SPC-8497 & RA-SPC-5685) and Saint Paul’s Grand Round (RA-SPC-11142). This bridge’s location coincides with a railroad bridge removed between 1991 and 2002. Park users who are traveling Saint Paul’s Grand Round or who otherwise enter or exit Phalen Park from the south would pass under this bridge. The Johnson Parkway Bridge would also be visible from Phalen Park. Because a bridge was in this location throughout much of the historic property’s period of significance, reviewing the design of the Johnson Parkway Bridge in accordance with the SOI Standards may minimize and/or avoid potential adverse effects. The review would need to include minimizing the structure’s mass, scale, and visibility from Phalen Park’s viewshed, and design development should incorporate plantings in keeping with the park-like setting of Saint Paul’s Grand Round.

Traffic, Access, and Parking
The proposed Project would not dramatically modify any of the existing access points to Phalen Park. No changes would be made to traffic signals at Johnson Parkway’s intersections with Phalen Boulevard and Maryland Avenue East. New traffic signals would be introduced where the dedicated BRT roadway intersects Maryland Avenue, Larpenteur Avenue East, and Frost Avenue. Stop signs would be introduced where the dedicated BRT roadway intersects Arlington Avenue East, Idaho Avenue East, and Ripley Avenue. None of these signal modifications would impede access to the historic property. An underpass for a pedestrian trail from McAfee Street to East Shore Drive is proposed to use an existing bridge (RA-SPC-11140) that contributes to the LS&M Railroad Corridor Historic District. A permanent acquisition totaling 0.83 acres is proposed for a stormwater BMP outside the historic property boundary, north of
the Maryland Avenue Station. The Project also proposes temporary easements totaling 0.31 acres for reconstruction of existing sidewalks and trails. Project documents indicate these acquisitions and temporary easements would not result in permanent physical impacts or interfere with the activities of the park.\textsuperscript{152} The Project would not result in the loss of any on-street parking spaces within or adjacent to Phalen Park. Although the Johnson Parkway Bridge would have a visual effect on access to Phalen Park from the south, any potential adverse effects to Phalen Park and Johnson Parkway can be avoided and/or minimized through reviewing the design of the Johnson Parkway Bridge in accordance with the SOI Standards.

**Recommended Finding of Effect: No Adverse Effect with Conditions**

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on Phalen Park if certain conditions are placed on the Project**. Although construction of the Project would physically affect a noncontributing resource within Phalen Park and introduce temporary and permanent visual effects within the park’s viewshed, the proposed conditions ensure the Project would not alter any of the characteristics that qualify Phalen Park for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association. The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

- As part of design development, the trail connection to the noncontributing Bruce Vento Regional Trail will be blended visually and materially by mimicking the profile and appearance of the existing trail. In addition, vegetative screening will be reestablished between Phalen Park and built Project elements within adjacent to the historic property boundary.
- A CPPHP will be prepared to ensure East Shore Drive is physically protected during construction of the Project.
- To minimize visual impact and maximize compatibility with Phalen Park, Johnson Parkway, and Saint Paul’s Grand Round while still meeting the Project’s Purpose and Need, the design of the Johnson Parkway Bridge will be reviewed according to the SOI Standards at the Project’s 30%, 60%, 90% and 100% Plans, with a consultation meeting prior to finalization of 60% design.

**Johnson Parkway (RA-SPC-8497 & RA-SPC-5685)**

Johnson Parkway from Indian Mounds Park to Lake Phalen, Saint Paul

**Description & Historic Significance**

Johnson Parkway, built between 1914 and 1945, extends from its southern terminus at Burns Avenue near Indian Mounds Park to its northern terminus at Wheelock Parkway and East Shore Drive in Phalen Park (RA-SPC-10850, see Figure 46).\textsuperscript{153} Johnson Parkway is considered an integral component of Saint Paul’s Grand Round (RA-SPC-11142), a park system proposed by Horace William Shaler Cleveland in the late 19th century and comprised of a series of large parks connected by parkways.\textsuperscript{154} For the majority of

---


\textsuperscript{154} See footnote 149 in the Phalen Park assessment for additional information about identification efforts involving Saint Paul’s Grand Round.
the Johnson Parkway’s length, it is a two (2)-lane, asphalt-paved road lined with trees and planting strips. However, a portion of the road in the Project APE has four (4) lanes. Various sections of the road include bike lanes, turn lanes, and adjacent single-lane service roads.

Figure 46. Johnson Parkway (in blue).
Johnson Parkway is being treated as eligible for inclusion in the National Register under Criterion A in the areas of Entertainment/Recreation and Community Planning and Development for its association with the development of the north portion of Saint Paul’s parkway system. It is also being treated as eligible under Criterion C, in the area of Architecture as a designed historic landscape for its historical association with the City Beautiful movement. The period of significance begins circa 1914, when land acquisition and construction began, and extends to 1945, when most construction activity had ended.

Although Johnson Parkway overall retains sufficient integrity to convey its historic significance, the portion of the parkway within the Project area has compromised integrity. Changes in this area since the period of significance include the addition of traffic lanes, alteration of the road alignment between Wheelock and Maryland, construction of Johnson Parkway’s intersection with Phalen Boulevard, the removal of the railroad bridge over Johnson Parkway, the introduction of a grassy median to the Parkway, changes to vegetation and lighting, modern development in the immediate setting, and reconstruction of the intersections at Wheelock Parkway, Maryland Avenue and Ames Avenue East (See Figure 47). The predominant character-defining features include “its function as a connection between parks, the absence of ‘added ornamentation,’ its ability to make the park system more widely accessible, and its continuation of park-like scenery through adjacent planting strips and plantings.”

**Potential Effects**

A portion of Johnson Parkway is located within the Project APE and within the LOD (see Figure 48). The dedicated BRT roadway and Bruce Vento Regional Trail would pass over the historic property on the proposed Johnson Parkway Bridge, incorporating retaining walls, sidewalk connections, and greenspace within the boundary of the historic property. In addition to the bridge over the historic property, proposed physical changes in the vicinity of the historic property include construction of the dedicated BRT roadway, Bruce Vento Regional Trail, retaining walls, linear stormwater BMPs, and the Cook Avenue and Maryland Avenue Stations. In addition, a small partial property acquisition would accommodate a sidewalk connection near the Cook Avenue Station. Therefore, in addition to the potential physical effect to Johnson Parkway, potential Project effects include visual effects of the proposed stations and dedicated BRT roadway in the vicinity of the historic property and potential changes in traffic, access, and parking.

---

Figure 47. Johnson Parkway near Phalen Park is shown in aerial photographs from 1945, 1985, and 2018 (left to right). The 1945 image shows Johnson parkway at the end of its period of significance. The arrow in the 1985 image points to extensive modifications where Johnson Parkway meets Maryland Avenue East and the arrow in the 2018 image points to extensive modifications from the removal of the railroad bridge and construction of Johnson Parkway’s intersection with Phalen Boulevard.\(^\text{157}\)

Assessment of Effects

Physical

The proposed Project would have a direct, physical effect to Johnson Parkway, which is also part of Saint Paul’s Grand Round. The Johnson Parkway Bridge would be constructed to carry the dedicated BRT roadway and Bruce Vento Regional Trail over the historic property. The location of the new bridge coincides with the former location of a railroad bridge removed between 1991 and 2002. Individuals traveling the Grand Round or who otherwise use Johnson Parkway between Phalen Boulevard and Maryland Avenue would pass under the new bridge. Additional Project elements are also proposed within the historic property boundary, including retaining walls, a connection between the Bruce Vento Regional Trail and the sidewalks alongside Johnson Parkway, and a linear BMP within the greenspace at the intersection of Phalen Boulevard and Johnson Parkway.

The Johnson Parkway Bridge would not impact the property’s ability to serve as connection between Indian Mounds Park and Phalen Park. Because the proposed bridge is located where a bridge formerly existed and within a portion of Johnson Parkway that has already been substantially altered, reviewing the design of the Johnson Parkway Bridge in accordance with the SOI Standards may minimize and/or avoid potential adverse effects. The review would need to consider the mass, scale, and design of the bridge, and design development should incorporate plantings in keeping with the park-like setting of the historic parkway and Saint Paul’s Grand Round. Because there are no historic features or materials remaining within the LOD other than the general route of Johnson Parkway, construction protection measures are not necessary for this historic property.

Visual

The Cook Avenue Station would be located approximately 375 feet west of Johnson Parkway’s western boundary, and the Maryland Avenue Station would be located approximately 30 feet east of Johnson Parkway.
Rush Line Bus Rapid Transit Project: Section 106 Assessment of Effects and Determination of Effect for Historic Properties

Parkway’s eastern boundary. The removal and reintroduction of vegetation, the grading of the landscape, the construction of Project elements, and the operation of the BRT service all have the potential to have a permanent visual effect on Johnson Parkway. The viewshed from Johnson Parkway toward the location of the proposed Cook Avenue Station, however, was altered severely by the construction of Phalen Boulevard. Therefore, the insertion of a BRT station into that viewshed would not diminish Johnson Parkway’s integrity of setting, feeling, or association. Due to Maryland Avenue Station’s distance from Johnson Parkway, potential visual effects would be minimal and can be avoided through reestablishment of appropriate park-like vegetative screening as design development continues.

Traffic, Access, and Parking
None of the existing access points to Johnson Parkway would be modified by the Project, and Johnson Parkway would continue to link Indian Mounds Park and Phalen Park. No changes would be made to traffic signals at Johnson Parkway’s intersections with Phalen Boulevard and Maryland Avenue East. At the Cook Avenue Station, a pedestrian crossing sign with rectangular rapid flash beacons would be installed to facilitate crossing of Phalen Boulevard. None of these signal modifications would impede access to the Johnson Parkway or diminish the historic property’s integrity of setting, feeling, or association. The Project would not result in the loss of any on-street parking spaces near Johnson Parkway. Therefore, the Project would have no effect on traffic, access, or parking associated with Johnson Parkway.

Recommended Finding: No Adverse Effect with Conditions
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect on Johnson Parkway if certain conditions are placed on the Project. Although construction of the Project would physically affect the historic property and impact the historic property’s viewshed, only a small segment of the entire length of the Parkway would be affected by the Project and construction would occur in an area of poor integrity for the property. Even when considering the cumulative effects of the Rush Line BRT and Gold Line BRT Projects, the overall integrity of the Parkway would continue to sufficiently convey its significance upon completion of both projects. The proposed conditions ensure the Project would not alter any of the characteristics that qualify Johnson Parkway for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association. The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

• To minimize visual impact and maximize compatibility with Phalen Park, Johnson Parkway, and Saint Paul’s Grand Round while still meeting the Project’s Purpose and Need, the design of the Johnson Parkway Bridge will be reviewed according to the SOI Standards at the Project’s 30%, 60%, 90% and 100% Plans, with a consultation meeting prior to finalization of 60% design.
• As part of Project design, vegetative screening will be reestablished between Johnson Parkway and built Project elements at the Maryland Avenue Station.
Gladstone Shops (Site 21RA70)
Southwest corner of Frost Avenue and English Street, Maplewood

Description & Historic Significance

Gladstone Shops (Site 21RA70) is currently known as the Gladstone Savanna Neighborhood Preserve, a 24-acre park managed by the City of Maplewood’s Parks and Recreation Department.¹⁵⁸ No above-ground structures are extant on the property.¹⁵⁹ An archaeological site on the parcel contains the remnants of the former Gladstone Shops, constructed beginning in 1887 by the St. Paul and Duluth (StP&D) Railroad (see Figure 49).¹⁶⁰ The shops included numerous buildings and structures associated with the repair and maintenance of railroad rolling stock. After the StP&D was purchased by Northern Pacific in 1900, the Gladstone Shops were closed. By 1915, some of the sidings had been removed and the property was leased to railroad contractors. During the 1940s, several primary buildings were removed from the property and by 1980, the remaining shops and structures had been demolished.

During archaeological monitoring and visual reconnaissance conducted in 2012, 37 archaeological features were identified. Site 21RA70 was designated as a City of Maplewood historic site in 2017, at which time it was recommended as individually eligible for inclusion in the National Register under Criterion D for its potential to provide important information under the research themes of technological change and adaptation and social group identity, behavior, and interaction. The local designation notes that with full evaluation of the site, it may also contribute to the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001) under Criterion A and Criterion D. However, the site is not connected to the district boundary and, therefore, National Register evaluation would need to consider the possibility of a discontiguous historic district. The period of significance of Site 21RA70 begins in 1887, when construction of the shops began and ends circa 1900, when Northern Pacific closed the shops. The Minnesota Archaeological Site Form indicates that “[b]ased on the limited scope of site disturbance and localized damage to the roundhouse foundation, the integrity of the site does not appear to have been significantly affected.”¹⁶¹ The local designation highlights the archaeological features (including buried foundations and limestone/concrete slabs), the flat landscape, and extant vegetation as being character-defining features with integrity of location.


¹⁵⁹ This location was previously recorded as Minnesota Architecture/History property RA-MWC-002 and recommended not eligible for inclusion in the National Register from an architecture/history perspective. The description and significance information is adapted from a Minnesota Archaeological Site Form completed in 2012 by Laurie Ollila, M.A., RPA of Summit Envirosolutions, Inc. as part of the local historic site designation process and the Phase II evaluation of the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001). Additional information is from Mead & Hunt and Midwest Valley Archaeology Center, Phase II Evaluation: Lake Superior & Mississippi Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment, 2020.

¹⁶⁰ The StP&D Railroad was organized in May 1877 by a group of LS&M inventors who had purchased the LS&M. The period of significance of the LS&M Railroad Corridor Historic District: Saint Paul to White Bear Lake Segment (XX-RRD-NPR001) includes the time during which the corridor was used by the StP&D.

¹⁶¹ Laurie Ollila, “Gladstone Shops (Site #21RA70),” Minnesota Archaeological Site Form, 7.
design, setting, materials and workmanship. It also notes that integrity of feeling and association as being diminished due to the loss of buildings.

**Figure 49. Site 21RA70 (approximate boundary outlined in blue).**  
![Figure 49](image)

**Potential Effects**
Site 21RA70 is located within the Project APE but outside the LOD (see Sheet 14 of the 15% Plans and Figure 50). The Project would not have any direct, physical effects to the historic property. However, proposed physical changes in the vicinity of the historic property include construction of the dedicated BRT roadway, the Bruce Vento Regional Trail, the Frost Avenue Station, and potential stormwater BMPs, including one (1) that might become a trailhead. Therefore, potential Project effects include visual effects of the proposed station, stormwater BMP, and dedicated BRT roadway and potential changes in traffic, access, and parking.

---

162 Image based on an aerial photograph from Ramsey County, “Ramsey County Interactive Property Map,” MapRamsey, 2018, [https://maps.co.ramsey.mn.us/MapRamsey/](https://maps.co.ramsey.mn.us/MapRamsey/) (accessed on August 19, 2020).
Figure 50. Proposed Project plans within the vicinity of the Gladstone Shops (eastern property boundary outlined in blue).

Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect Site 21RA70. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
The proposed dedicated BRT roadway would be approximately 300 feet east of Site 21RA70’s eastern boundary and the Frost Avenue Station would be approximately 345 feet from the historic property’s northeast corner. There are two (2) potential stormwater BMP locations located directly east of the historic property. One (1) would be located between the dedicated BRT roadway and English Street, which is adjacent to the historic property’s eastern boundary. This BMP location may also be integrated into a possible trailhead for the Bruce Vento Regional Trail. The other potential stormwater BMP location would be located directly east this potential trailhead, on the other side of the dedicated BRT roadway. All of these proposed Project elements are outside the historic property boundaries. Furthermore, due to existing vegetation within the historic property boundaries, the Project elements would be minimally visible from the historic property.
Traffic, Access, and Parking

The Rush Line BRT Project is coordinating with the City of Maplewood for a project involving partial street reconstruction of Frost Avenue between English Street and White Bear Avenue, anticipated for construction in 2022 (see purple shaded area on Sheet 15 of the 15% Plans). None of the existing access points to Site 21RA70 would be dramatically modified by the Project. A new traffic signal would be introduced east of the Frost Avenue and English Street roundabout, where the dedicated BRT roadway intersects Frost Avenue. In addition, a stop sign would be introduced where the dedicated BRT roadway intersects Ripley Avenue. None of these signal modifications would impede access to the historic property. If a trailhead is built in conjunction with the proposed stormwater BMP, it would improve access to the historic property by providing an easy transition from the Bruce Vento Regional Trail to the city park. The Project would not result in the loss of any on-street parking spaces near Site 21RA70. Therefore, the Project is anticipated to have no impact on traffic, access, or parking associated with Site 21RA70.

Recommended Finding: No Adverse Effect

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect to Site 21RA70. Construction of the Project would not physically, visually, or otherwise affect the historic property and, therefore, would not alter any of the characteristics that qualify Site 21RA70 for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association.

Moose Lodge 963 (RA-MWC-0134)

1946 English Street North, Maplewood

Description & Historic Significance

Moose Lodge 963 is a one (1)-story, concrete block and brick clad, Commercial-style building in Maplewood. The Moose Lodge is comprised of two (2) parts, the original 1964 building clad in rusticated brick and concrete block and the circa 1980 addition to the north elevation (Figure 51). On the south façade, there is an entry vestibule from the 1970s or circa 1980. It is framed in aluminum and enclosed with aluminum panels and one-over-one aluminum windows, which covers over the original entrance to the building. A freestanding metal sign, which may date to the 1960s, is located near the driveway entrance on English Street. The interior of the building retains gathering spaces and bar and kitchen areas, though portions were likely renovated at the time of the circa 1980 addition. The property is associated with the activities of Maplewood’s Human Rights Commission, formed in 1967. Moose Lodge 963 did not permit non-whites to join as members, a policy that followed the national Order’s policies but violated Minnesota’s anti-discrimination laws. In 1971, after the Human Rights Commission filed a case against the Moose Lodge, the Lodge changed its white-only membership requirements. The Human Rights Commission’s targeting of the Moose Order’s discriminatory policies of restricted membership was an emerging trend in the Twin Cities that approached combatting

---

165 The evaluation notes this sign as a character-defining feature on the property. However, no date of construction is given and, if it dates to the 1960s, the sign may have been moved to this location when the circa 1980 addition was constructed.
discrimination through local and municipal ordinance rather than relying on state-level action and enforcement. The success of the Maplewood ordinance to combat local discrimination influenced other Twin Cities suburbs.

Figure 51. Moose Lodge 963, facing northwest.¹⁶⁶

Moose Lodge 963 is eligible for inclusion in the National Register under Criterion A in the area of Social History for its role in Maplewood’s civil rights movement.¹⁶⁷ The period of significance is 1970 to 1971, which corresponds to when the lodge was the focus of Maplewood Human Rights Commission’s efforts to combat discrimination and with the passage of a village ordinance that forbade public and private clubs that practiced discrimination from obtaining a liquor license, a move that set a precedent for local governing bodies to work toward racial equality. Overall, the historic property has sufficient integrity to convey its historic function and significance. However, the circa 1980 addition and enclosure of the building’s south entrance have diminished its integrity of design, materials, and workmanship and a modern apartment complex across English Street has altered its setting. Character-defining features include the property’s location in Maplewood, the simple midcentury design of the lodge building and the freestanding sign, and the lodge building’s interior layout with large gathering spaces, bars, and stage, all of which convey the property’s historic function as a mid-20th century building for the fraternal order.

Potential Effects
The proposed Project includes operation of BRT vehicles in a dedicated BRT roadway adjacent to Moose Lodge 963; no physical changes are proposed within the historic boundary (see Sheets 14 and 15 of the 15% Plans and Figure 52). Proposed visual changes in the vicinity of the Moose Lodge include

---
¹⁶⁶ Images from Sebastian Renfield, “Moose Lodge 963 (RA-WBC-0134),” Figure 7.
¹⁶⁷ In its comments on the architecture/history investigations, MnSHPO noted that “a considerable amount of additional research and documentation, particularly as it relates to the building modifications which occurred in the 1980s, would be needed to actually nominate this property to the [National Register].” Sarah Beimers, MnSHPO, letter to Jay Ciavarella, FTA, September 15, 2020.
construction of the dedicated BRT roadway, the Bruce Vento Regional Trail, the Gateway Trail Underpass, the Gateway Trail/Bruce Vento Regional Trail intersection adjacent to the north edge of the historic property, and two (2) proposed stormwater BMPs approximately 500 feet south of the historic property. Therefore, potential Project effects would include visual effects of the proposed station, underpass, stormwater BMPs, and dedicated BRT roadway and potential changes in traffic, access, and parking.

**Figure 52. Proposed Project plans within the vicinity of Moose Lodge 963 (outlined in blue).**

**Assessment of Effects**

**Physical**

As currently designed, the proposed Project would not directly, physically affect Moose Lodge 963. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

**Visual**

Proposed visual changes along the eastern edge of Moose Lodge 963 include construction of the dedicated BRT roadway, Bruce Vento Regional Trail, Gateway Trail Underpass, Gateway Trail/Bruce Vento Regional Trail interchange, and BMP site. However, the historic property’s setting has already been altered since the period of significance with the introduction of new construction and paving of the Bruce Vento Regional Trail and the Gateway Trail within the viewshed of Moose Lodge 963. In addition, the design of the dedicated BRT roadway would follow the *Ramsey County Rail Right-of-Way Design Guide*, which recommends reestablishment of vegetative screening along the edges of the corridor. 168 None of the proposed Project elements would diminish the historic property’s integrity of setting, feeling, or association any further.

---

Traffic, Access, and Parking
The Rush Line BRT Project is coordinating with the City of Maplewood for a project involving partial street reconstruction of Frost Avenue between English Street and White Bear Avenue, anticipated for construction in 2022 (see purple shaded area on Sheet 15 of the 15% Plans). None of the existing access points to Moose Lodge 963 would be dramatically modified by the Project. A new traffic signal would be introduced east of the Frost Avenue and English Street roundabout, where the dedicated BRT roadway intersects Frost Avenue. However, this would not impede access to the historic property. The Project would not result in the loss of any on-street parking spaces near Moose Lodge. Therefore, the Project is anticipated to have no impact on traffic, access, or parking associated with the historic property.

Recommended Finding: No Adverse Effect
Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have No Adverse Effect on Moose Lodge 963. The historic property would not be physically affected by the Project. Although Project elements will be constructed near the historic property, any alterations to the viewshed would be minor and views to and from the historic building and sign would not be changed. Furthermore, the setting has been altered previously and is not a character-defining feature.

Madeline L. Weaver Elementary School (RA-MWC-0106)
2135 Binghamton Street, Maplewood

Description & Historic Significance
Madeline L Weaver Elementary School (Weaver Elementary School) is a one (1)-story, brick, Midcentury Modern style building in Maplewood (Figure 53). The building has a cross-plan with four (4) nearly identical wings; however, the west wing is a planned 1967–68 addition to the original 1966 building. Both the original building and the addition were designed by Corwin, Seppanen, & Associates, Inc., a Saint Paul-based architecture firm. The main entrance, at the junction of the east and north wings, consists of a walkway sheltered by an extension of the east wing’s roof gable supported by four (4) brick screens. Weaver Elementary School was constructed with key features of 1960s and 1970s education design by using modern building methods and emphasizing functionality over aesthetics by having a simple geometric form and an open-space interior plan. During the 1960s and 1970s, education philosophy was influenced by social issues such as “desegregation, conservation, and emphasis on freedom of expression and the individual.” School design was influenced by education philosophy and new technology leading to open-space school design for teaching flexibility as well as energy-conserving lighting and ventilation systems.

171 Ohland, Katie, “Madeline L. Weaver School (RA-MWC-0106),” 17.
Weaver Elementary School is eligible for inclusion in the National Register under Criterion C in the area of Architecture as an example of a 1960s elementary school within Maplewood and Independent School District 622. The property may also be eligible under Criterion A in the area of Education. The period of significance is from 1966 to 1968, from the initial construction to the completion of the west classroom wing. The boundary corresponds to the building parcel, including the school building and associated play fields; however, only the school building contributes to the property’s significance. Weaver Elementary School retains a high degree of integrity with only minor changes to the landscape. Weaver Elementary School retains sufficient integrity of setting, location, materials, design, workmanship, association, and feeling to convey its significance under Criterion C as an excellent example of a mid-20th century school. Character-defining features of the property include a low sprawling, one (1)-story design, a cross-shaped plan with classroom wings and common areas, interior spaces that allowed for flexible teaching methods, a brick exterior, brick screens, and window units and slatted metal grate panels at each classroom.

**Potential Effects**

Weaver Elementary School is located within the Rush Line Project APE; the LOD is approximately 160 feet from the school building (see Sheet 15 of the 15% Plans and Figure 54). The proposed dedicated BRT roadway would be adjacent to the property’s western boundary. Proposed physical changes within the historic property boundary includes construction of a trail connections from Weaver Elementary School to the Bruce Vento Regional Trail and to English Street. Proposed physical changes in the vicinity of the historic property include construction of the dedicated BRT roadway, Bruce Vento Regional Trail and Weaver Elementary School trail connections, the Weaver Trail Underpass, and stormwater BMP

---

172 Image from Ohland, Katie, “Madeline L. Weaver School (RA-MWC-0106),” Minnesota Individual Property Inventory Form, Figure 7.

173 Although the evaluation noted that Weaver Elementary School did not play a significant role in the expansion of Independent School District 622 or in the educational philosophies of the 1960s, MnSHPO noted in their comments on the evaluation that the office “remains unconvinced the property is not also eligible under Criterion A in the area of education with a period of significance 1966–1968.” Sarah Beimers, MnSHPO, letter to Jay Ciavarella, FTA, September 15, 2020. This assessment of effects considers the significance and character-defining features of the property in light of MnSHPO’s comments.
sites, some of which would require permanent property acquisition. Therefore, in addition to the potential physical effect to Weaver Elementary School, potential Project effects would include visual effects of the Weaver Trail Underpass, dedicated BRT roadway, trail and trail connections, and stormwater BMP sites; and potential changes in traffic, access, and parking.

**Figure 54. Proposed Project plans within the vicinity of Madeline L. Weaver Elementary School (western boundary outlined in blue).**

---

**Assessment of Effects**

**Physical**

Although the proposed Project would have a direct, physical effect to Weaver Elementary School, the effect would be minor and the school building would not be physically affected. On the western edge of the property, 0.11 acres of the historic property would be permanently acquired and 0.45 acres would be placed under a temporary easement to reconfigure a trail connection to English Street and connections to the Bruce Vento Regional Trail. In addition, on the northern edge of the historic property, 1.45 acres would be permanently acquired to construct a stormwater BMP. Because these acquisitions and proposed construction would not physically impact the school building, none of the changes would diminish the historic property’s integrity of design, materials, workmanship, feeling, or association, though they could somewhat diminish integrity of setting. The size, depth, and design of the BMP will be informed by stormwater analysis currently underway. In some cases, the stormwater BMP locations may be removed from consideration. Any potential adverse physical effects to the building...

---

caused by unintended damage from construction activities can be avoided with construction protection measures incorporated into contract documents.

**Visual**

Directly adjacent to the western edge of the historic boundaries of Weaver Elementary School, construction would include the dedicated BRT roadway, the Weaver Trail Underpass, Bruce Vento Regional Trail, retaining walls, and linear stormwater BMPs. In addition, a stormwater BMP on the opposite side of the dedicated BRT roadway would require property acquisition. Although all of these Project elements are outside of Weaver Elementary School’s historic property boundaries, the removal and reintroduction of vegetation, the grading of the landscape, and the construction of Project elements all have the potential to have a permanent visual effect on the historic property. However, these visual effects can be minimized and/or avoided through reestablishment of appropriate vegetative screening as design development continues. Project documentation notes the “moderate visual impacts” would be “mitigated by landscaping as specified in the Ramsey County Rail Right-of-Way Design Guide,” which recommends reestablishment of vegetative screening along the edges of the corridor.\(^{175}\) Reviewing the design of the Weaver Trail Underpass in accordance with the SOI Standards may also minimize and/or avoid potential adverse effects. The review would need to include minimizing the structure’s mass, scale, and visibility within the historic property’s viewedh.

**Traffic, Access, and Parking**

The Project is not expected to intensify or alter land use patterns adjacent to Weaver Elementary School. Although a new traffic signal would be installed where the dedicated BRT roadway intersects County Road B East, the Project would not impact access to or parking at the historic property. Although motorized vehicles do not typically operate on the Bruce Vento Regional Trail today, the rail corridor was active during the property’s period of significance, so the introduction of BRT vehicles to this former rail corridor would not impact the historic property’s integrity of setting, feeling, or association.\(^{176}\)

**Recommended Finding: No Adverse Effect with Conditions**

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have **No Adverse Effect on Madeline L. Weaver Elementary School if certain conditions are placed on the Project**. Although construction of the Project would physically affect a portion of the historic property and introduce temporary and permanent visual changes within the viewshed, the proposed condition ensures the Project would not alter any of the characteristics that qualify Weaver Elementary School for inclusion in the National Register or diminish the historic property’s integrity of location, design, setting, materials, workmanship, feeling, or association. The recommended finding of No Adverse Effect is dependent upon the following conditions being placed on the Project:

- As part of design development along the western edge of the historic property, vegetative screening will be reestablished between Weaver Elementary School and built Project elements.
- To minimize the visual impact and maximize compatibility with Weaver Elementary School while still meeting the Project’s Purpose and Need, the design of Project elements, including the Weaver Trail Underpass, trails, and stormwater BMP, will be reviewed according to the SOI

---


Standards at the Project’s 30%, 60%, 90% and 100% Plans, with a consultation meeting prior to finalization of the 60% design. The consultation meeting will also determine whether a CPPHP is necessary to ensure the Weaver Elementary School building is physically protected during construction of the Project.

Polar Chevrolet Bear/Paul R. Bear (RA-WBC-0031)
1801 County Road F East, White Bear Lake

Description & Historic Significance
The Polar Chevrolet Bear, also known as Paul R. Bear, is a fiberglass polar bear sculpture erected in 1964 by Minnesota artist Gordon Schumaker. The 30-foot-tall bear was built as a roadside sign for Polar Chevrolet automobile dealership in White Bear Lake at the intersection of TH 61 and County Road F East. The bear is mounted on a 20-foot-tall pedestal, dating from between 1980 and 1991, and holds a lighted Chevrolet sign (Figure 55). Between 1972 and 1980, the bear was moved twice. Its original location was close to TH 61, and it was moved to the roof of the dealership before being placed in its current location approximately 10 feet from the dealership’s front entrance.

Figure 55. Polar Chevrolet Bear on its original pedestal in 1976 (left), and in its current location (right).

In Minnesota, many roadside colossi were built to encourage automobile tourism during the mid-20th century. Fiberglass became a popular material for roadside sculptures after World War II. The bear was designed and built by Schumaker, an accomplished designer and craftsman of parade floats and roadside colossi in Minnesota. The Polar Chevrolet Bear is an example of Schumaker’s body of work and is the only known sculpture the craftsman created for a private business. The sculpture is a postwar,

177 Information on Polar Chevrolet Bear/Paul R. Bear comes from Chris Hommerding, “Polar Chevrolet Bear (RA-WBC-0031),” Minnesota Individual Property Inventory Form, 2019.
178 Steven W. Platner, Ralph Thomas Chevrolet, Highway 61 and East County Road F, White Bear Lake, Negative #01611-20a, Photograph, 1976, MR2.9 WB3.1 p13, Minnesota Historical Society, Saint Paul, MN; Current image is from Hommerding, Chris, “Polar Chevrolet Bear (RA-WBC-0031),” Figure 1.
automobile dealership advertisement and was built to be highly visible to passing motorists. Although the sculpture was designed for a private business, the bear quickly became a symbol of the city of White Bear Lake.

The Polar Chevrolet Bear/Paul R. Bear is an object that is eligible for inclusion in the National Register under Criterion C for Art and meets the requirements for Criteria Consideration B (moved properties).\textsuperscript{179} The property's period of significance is 1964. Overall, the historic property retains sufficient integrity to convey its historic significance as a roadside colossus, including integrity of design, materials, workmanship, setting, feeling, and association. The Polar Chevrolet Bear does not retain integrity of location, but the object does meet the requirements for Criteria Consideration B as it “remains in a prominent highly visible location on a pedestal near its original site and still on the overall dealership property.”\textsuperscript{180} Character-defining features include the fiberglass shell, original Chevrolet sign, relationship to the automobile industry illustrated by its location on automobile dealership property, and its high visibility with prominent placement visible from the TH 61 corridor.

**Potential Effects**

The proposed Project includes operation of BRT vehicles in a dedicated BAT lane on TH 61, approximately 170 feet from the Polar Chevrolet Bear (see Sheets 26 and 71 of the 15% Plans and Figure 56). As noted in the 15% Plans, the only proposed construction in the vicinity of the historic property is to extend the existing roadway shoulder to accommodate the BAT lane and replace the existing guardrail. Therefore, potential effects of the Project on the Polar Chevrolet Bear would include the visual effects of BAT lane construction in the vicinity of the historic property and potential changes in traffic, access, and parking.

\textsuperscript{179} The evaluation identified the resource type as a Structure and the area of significance as Architecture. In their comments, MnSHPO noted the “appropriate area of significance under Criteria C is Art (not architecture) and the appropriate property type is Object (not Structure).” Sarah Beimers, MnSHPO, letter to Jay Ciavarella, FTA, September 15, 2020. This assessment of effects considers the resource type and significance of the property in light of MnSHPO’s comments.

\textsuperscript{180} Hommerding, Chris, “Polar Chevrolet Bear (RA-WBC-0031),” 22.
Assessment of Effects

Physical
As currently designed, the proposed Project would not directly, physically affect the Polar Chevrolet Bear. Therefore, the Project would not diminish the historic property’s integrity of location, design, materials, or workmanship.

Visual
The introduction of the proposed BAT lanes within the viewshed of the Polar Chevrolet Bear would be a minor change to the historic property’s setting, which has already been altered through the expansion of TH 61 into a four (4)-lane highway. Views to the historic property from TH 61 would remain unobscured. Therefore, the Project would not diminish the historic property’s integrity of setting, feeling, or association any further.

Traffic, Access, and Parking
The Project is not expected to intensify or alter land use patterns adjacent to the Polar Chevrolet Bear. Although the traffic signal at TH 61 intersection with County Road F would be modified, the Project

\textit{Recommended Finding: No Adverse Effect}

Based on the Project’s 15% Plans and the draft EA, the Project is anticipated to have \textbf{No Adverse Effect on the Polar Chevrolet Bear}. The historic property would not be physically affected by the Project. Although dedicated BAT lanes would be inserted between TH 61 and the historic property, any alterations to the viewshed would be minor and the views to and from the historic property would not be changed. The setting has been altered previously by the expansion of TH 61 into a four (4)-lane divided highway and the proposed Project elements would not diminish this altered setting any further. Therefore, the Project would not alter any of the characteristics that qualify the historic property for inclusion in the National Register or diminish the historic property’s integrity of design, materials, workmanship, setting, feeling, or association.
Section 6: Project Determination of Effect

Based on the results of the assessment of effect analysis conducted by MnDOT CRU under delegation from FTA, summarized in Table 7, FTA has found that the Project will result in:

- An Adverse Effect on five (5) historic properties;
- No Adverse Effect on 15 historic properties; and
- No Adverse Effects with conditions on eight (8) properties.

Therefore, FTA has determined, based on the Project’s 15% Plans, that the undertaking will have an Adverse Effect on historic properties. Pursuant to 36 CFR 800.6, consultation under Section 106 will continue in order to resolve the Adverse Effect. Suggested measures for minimizing and avoiding adverse effects, outlined in the individual property assessments above, will be discussed with Section 106 consulting parties and documented, along with appropriate mitigation measures for any adverse effects that cannot be avoided or minimized, in a memorandum of agreement.

Table 7. Summary of Effects Findings

<table>
<thead>
<tr>
<th>Inventory or Site No.</th>
<th>Property Name</th>
<th>Address</th>
<th>City</th>
<th>Effect Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-4580</td>
<td>Lowertown Historic District</td>
<td>Roughly bounded by Shepard Road, Kellogg Boulevard, Broadway Street, 7th Street, and Sibley Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect with Conditions</td>
</tr>
<tr>
<td>RA-SPC-5225</td>
<td>Saint Paul Union Depot</td>
<td>214 East 4th Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect with Conditions</td>
</tr>
<tr>
<td>RA-SPC-5462</td>
<td>Finch, Van Slyck and McConville Dry Goods Company</td>
<td>360–366 Wacouta Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-8364</td>
<td>Saint Paul Urban Renewal Historic District</td>
<td>Roughly between 6th Street, Kellogg Boulevard, Wabasha Street, and Jackson Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-3168</td>
<td>First Farmers and Merchants National Bank Building</td>
<td>332 Minnesota Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-4645</td>
<td>First National Bank of Saint Paul</td>
<td>332 Minnesota Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-3167</td>
<td>Pioneer and Endicott Buildings</td>
<td>322–350 North Robert Street, 141 East 4th Street, 142 East 5th Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
</tbody>
</table>

182 Historic properties are in the order they are presented in this report, which generally runs from south to north, except where properties are grouped, such as with the resources associated with the LS&M Railroad.
<table>
<thead>
<tr>
<th>Inventory or Site No.</th>
<th>Property Name</th>
<th>Address</th>
<th>City</th>
<th>Effect Finding</th>
</tr>
</thead>
<tbody>
<tr>
<td>RA-SPC-3170</td>
<td>Manhattan Building (aka Empire Building)</td>
<td>360 North Robert Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-3171</td>
<td>Golden Rule Department Store Building</td>
<td>85–95 7th Place</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-3174</td>
<td>Foot, Schulze &amp; Company Building</td>
<td>500 North Robert Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-6330</td>
<td>Produce Exchange Building</td>
<td>523 Jackson Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-5918</td>
<td>Great Northern Railroad Corridor Historic District</td>
<td>Saint Paul to Minneapolis</td>
<td>Saint Paul</td>
<td>No Adverse Effect with Conditions</td>
</tr>
<tr>
<td>RA-SPC-4582</td>
<td>StPM&amp;M Railway Company Shops Historic District</td>
<td>Jackson Street and Pennsylvania Avenue</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-5618</td>
<td>Westminster Junction</td>
<td>Roughly bounded by the Lafayette Road Bridge, I-35E, a line approximately 1,300 feet south of the Cayuga Street Bridge, and a line approximately 400 feet southwest of the Cayuga Street/Phalen Boulevard intersection</td>
<td>Saint Paul</td>
<td>No Adverse Effect with Conditions</td>
</tr>
<tr>
<td>XX-RRD-CNWO001</td>
<td>StPS&amp;TF/Omaha Road Railroad Corridor Historic District</td>
<td>Saint Paul to Stillwater Junction Segment</td>
<td>Saint Paul</td>
<td>No Adverse Effect with Conditions</td>
</tr>
<tr>
<td>XX-RRD-NPR001</td>
<td>LS&amp;M Railroad Corridor Historic District</td>
<td>Saint Paul to White Bear Lake Segment</td>
<td>Saint Paul, Maplewood, Vadnais Heights and White Bear Lake</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>XX-RRD-NPR004</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Eldridge Avenue East and County Road B East</td>
<td>Maplewood</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>XX-RRD-NPR003</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Gervais Avenue and County Road C</td>
<td>Maplewood</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>XX-RRD-NPR002</td>
<td>1868 Alignment of the LS&amp;M Railroad</td>
<td>Between Kohlman and Beam Avenues</td>
<td>Maplewood</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>Inventory or Site No.</td>
<td>Property Name</td>
<td>Address</td>
<td>City</td>
<td>Effect Finding</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------------------------------------------------</td>
<td>----------------------------------------------</td>
<td>-----------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>XX-RRD-NPR005</td>
<td>LS&amp;M Railroad Corridor Historic District</td>
<td>White Bear Lake to Hugo Segment</td>
<td>White Bear Lake</td>
<td>Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-2926</td>
<td>Theodore Hamm Brewing Company Complex</td>
<td>Minnehaha Avenue East between Payne Avenue &amp; Stroh Drive</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-0455</td>
<td>3M Administration Building (3M Main Plant, Building 21)</td>
<td>777 Forest Street</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-10850</td>
<td>Phalen Park (3M Main Plant, Building 21)</td>
<td>1600 Phalen Drive</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-8497</td>
<td>Johnson Parkway</td>
<td>Johnson Parkway from Indian Mounds Park to Lake Phalen</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-SPC-5685</td>
<td>Johnson Parkway</td>
<td>Johnson Parkway from Indian Mounds Park to Lake Phalen</td>
<td>Saint Paul</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Site 21RA70</td>
<td>Gladstone Shops (Gladstone Savanna Neighborhood Preserve)</td>
<td>Southwest corner of Frost Avenue and English Street</td>
<td>Maplewood</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-MWC-0134</td>
<td>Moose Lodge 963</td>
<td>1946 English Street North</td>
<td>Maplewood</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-MWC-0106</td>
<td>Madeline L. Weaver Elementary School</td>
<td>2135 Binghamton Street</td>
<td>Maplewood</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>RA-WBC-0031</td>
<td>Polar Chevrolet Bear/Paul R. Bear</td>
<td>1801 County Road F East</td>
<td>White Bear Lake</td>
<td>No Adverse Effect</td>
</tr>
</tbody>
</table>
References


Appendices
This page intentionally left blank
Appendix A: 15% Plans, Dated August 7, 2020
This page intentionally left blank
Metro Transit is not the planned operator or manager of the proposed Highway 36 Park-and-Ride, and an alternative ownership commitment has not been made at this time.

Approx. area of potential parking lot 1.70 AC

Ongoing coordination with City of Maplewood and Metro Transit

Provide access to existing trail

City of Maplewood

Highway 36 station concept - Harvest Park Context Plan
EXISTING TYPICAL SECTION
ROBERT STREET - 9TH STREET TO 11TH STREET

PROPOSED TYPICAL SECTION
ROBERT STREET - 9TH STREET TO 11TH STREET

RUSH LINE BRT PROJECT
15% PLANS - 08/07/2020
TYPICAL SECTIONS
PROPOSED TYPICAL SECTION
PHALEN BOULEVARD/BRUCE VENTO REGIONAL TRAIL - JOHNSON PARKWAY BRIDGE

RUSH LINE BRT PROJECT
15% PLANS - 08/07/2020
TYPICAL SECTIONS
EXISTING TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - JOHNSON PARKWAY TO LARPENTEUR AVENUE

PROPOSED TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - JOHNSON PARKWAY TO LARPENTEUR AVENUE
EXISTING TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - LARFENITE AVENUE TO TH 36

PROPOSED TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - LARFENITE AVENUE TO TH 36
EXISTING TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - TRAIL SPLIT SOUTH OF BEAM AVENUE

PROPOSED TYPICAL SECTION
BRUCE VENTO REGIONAL TRAIL - TRAIL SPLIT SOUTH OF BEAM AVENUE

RUSH LINE BRT PROJECT
15% PLANS - 08/07/2020
TYPICAL SECTIONS
EXISTING TYPICAL SECTION
DEDICATED GUIDEWAY - BRIDGE OVER I-694

PROPOSED TYPICAL SECTION
DEDICATED GUIDEWAY - BRIDGE OVER I-694
EXISTING TYPICAL SECTION
BUERKLE ROAD - DEDICATED GUIDEWAY TO FANUM ROAD

PROPOSED TYPICAL SECTION
BUERKLE ROAD - DEDICATED GUIDEWAY TO FANUM ROAD
EXISTING TYPICAL SECTION
TH 61 - WILLOW LAKE BOULEVARD TO COUNTY ROAD E STATION

PROPOSED TYPICAL SECTION
TH 61 - WILLOW LAKE BOULEVARD TO COUNTY ROAD E STATION

RUSH LINE BRT PROJECT
15% PLANS - 08/07/2020
TYPICAL SECTIONS
EXISTING TYPICAL SECTION
TH 61 - COUNTY ROAD E STATION TO BRIDGE OVER BNSF RAILWAY

PROPOSED TYPICAL SECTION
TH 61 - COUNTY ROAD E STATION TO BRIDGE OVER BNSF RAILWAY
EXISTING TYPICAL SECTION
TH 61 - CEDAR AVENUE STATION

PROPOSED TYPICAL SECTION
TH 61 - CEDAR AVENUE STATION
EXISTING TYPICAL SECTION
TH 61 - 2ND STREET TO 5TH STREET

PROPOSED TYPICAL SECTION
TH 61 - 2ND STREET TO 5TH STREET
RUSH LINE BRT PROJECT
PLATFORM PLANS
15% PLANS - 08/07/2020
11' x 50' Station Platform Layout - Plan
10th Street - Northbound Ramp Access at Both Ends

14' x 130' Station Platform Layout - Plan
10th Street - Southbound Ramp Access at Both Ends, Northbound Walk Access
14th Street - Ramp Access at Both Ends, Both Platforms
MT Airy Street - Southbound Ramp Access, Northbound Walk Access
Downtown White Bear Lake - Ramp Access at Both Ends
Maplewood Mall Transit Center - Walk Access at One End
20' x 80' STATION PLATFORM LAYOUT - PLAN
COUNTRY ROAD E - WALK ACCESS AT BOTH ENDS
CEDAR AVENUE - RAMP ACCESS AT BOTH ENDS

8' x 110' STATION PLATFORM LAYOUT - PLAN
UNION DEPOT - RAMP ACCESS AT BOTH ENDS
10' x 80' STATION PLATFORM LAYOUT - PLAN
WHITAKER STREET - SOUTHBOUND WALK ACCESS AT BOTH ENDS

10', 11', 14', and 26'
STATION PLATFORM

0 TO 6'
2.5' DETECTABLE WARNING

TYPICAL PLATFORM - SECTION APPLIES TO ALL PLATFORMS WITH THE EXCEPTION OF UNION DEPOT

8.0' CLEAR OF VERTICAL OBSTRUCTIONS

2.0' DETECTABLE WARNING

6.0' PATRON WAITING AREA AND STRUCTURE ZONE

4.5' PATRON WAITING AREA AND STRUCTURE ZONE

6.0' PATRON WAITING AREA AND STRUCTURE ZONE

VARES

TRAIL/SIDWALK (AT SOME STATIONS)

MARKING SLAB
Appendix B: Area of Potential Effects, dated February 3, 2020
This page intentionally left blank
Area of Potential Effect

Rush Line BRT
Ramsey County, Minnesota

Limits of Disturbance (1-31-2020)
Alignment (1-21-2020)
Station Platforms (1-21-2020)
Bridges (1-27-2020)
Sidewalks and Trails (1-31-2020)
Park and Rides (1-31-2020)
Retaining Walls (1-28-2020)
Potential Stormwater (BMP) Points (9-20-2019)
Potential Linear Stormwater (BMP) Sites (9-20-2019)

As Revised on 2/3/2020
Page 2 of 16
Area of Potential Effect

As Revised on 2/3/2020

Page 9 of 16
Rush Line BRT
Ramsey County, Minnesota

Area of Potential Effect (2-3-2020)
Limits of Disturbance (1-31-2020)
Alignment (1-21-2020)
Station Platforms (1-21-2020)
Bridges (1-27-2020)
Sidewalks and Trails (1-31-2020)
Park and Rides (1-31-2020)
Retaining Walls (1-28-2020)
Potential Stormwater (BMP) Points (9-20-2019)
Potential Linear Stormwater (BMP) Sites (9-20-2019)
Rush Line BRT
Ramsey County, Minnesota

- Area of Potential Effect (2-3-2020)
- Limits of Disturbance (1-31-2020)
- Alignment (1-21-2020)
- Station Platforms (1-21-2020)
- Bridges (1-27-2020)
- Sidewalks and Trails (1-31-2020)
- Park and Rides (1-31-2020)
- Retaining Walls (1-28-2020)
- Potential Stormwater (BMP) Points (9-20-2019)
- Potential Linear Stormwater (BMP) Sites (9-20-2019)

As Revised on 2/3/2020
Page 15 of 16