

February 24, 2017

Sam Pertz
Parks & Trails Supervisor
Carver County Parks
11360 Highway 212, Suite 2
Cologne, MN 55322

RE: Remove buildings, structures and debris on Coney Island of the West and redevelop the island for recreation purposes (Lake Waconia Regional Park)
T116 R25 S12 & S13, Waconia Twp, Carver County
MnHPO Number: 2017-0395

Dear Mr. Pertz:

Thank you for continuing consultation on the above project. Information received in our office on 26 January 2017 has been reviewed pursuant to the responsibilities given to the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

As you are aware, **Coney Island of the West** (CR-WAT-001) is listed in the National Register of Historic Places (NRHP). The nomination was prepared in the 1970s when several of the structures were still standing and therefore the listing focuses on architecture as the primary Area of Significance. The buildings have since collapsed, creating safety hazards on the island and a significant loss of historical integrity as it pertains to architecture. However, we do believe that the property is still very significant and retains sufficient integrity to continue to be listed in the NRHP as stabilization and preservation of any remaining building remnants/foundations, as well as associated landscape features (roadways, walkways, fence-lines, retaining walls, overlooks, etc), will preserve an aspect of architectural design.

David Mather, MnHPO National Register Archaeologist, has completed a review of your 23 January 2017 submittal which included the report entitled *A Phase I Cultural Resource Assessment of the Proposed Lake Waconia Regional Park, Coney Island of the West, Waconia, Carver County, Minnesota, Township 116N, Range 25W, Sections 12 & 13* (January 2017) prepared by Blondo Consulting and has the following comments:

This is an excellent report. It presents a comprehensive context for the study, and is a thorough reconnaissance survey of the area of potential effects (APE), which is appropriately identified as the entire island. I agree with the recommendation in this report that the island is still eligible for listing in the NRHP under Criterion A, and likely also under Criterion D. The historical archaeology and pre-contact archaeological sites identified through this survey are an important contribution to our understanding of the island's history.

I also agree that the currently proposed trail development would be an adverse effect on the historic property because it cuts through the identified sites. Before trail development occurs, a Phase II evaluation study should be completed. Trails and related infrastructure development should be designed to avoid cultural resources that are found to be significant through the Phase II study. The information from this investigation should be used to update the NRHP documentation for the island, and to develop interpretive signs or media. I agree that a management plan for the island is appropriate, but the Phase II study should be the basis for that plan, and if at all possible, the proposed development should avoid adverse effects. If impacts cannot be avoided, it is likely that some type of treatment or mitigation would be needed.

It is my understanding that the Phase II, the NRHP update, and development of interpretive materials would all be fundable projects under the Minnesota Historical and Cultural Heritage Grants program. However, mitigation would not be.

Given the current plan for park development, we recommend that the County undertake the following measures, with assistance from a consulting archaeologist and our office:

- Conduct a Phase II intensive level survey and evaluation study of the island and determine contributing and non-contributing features, especially those features that have the potential to be directly or indirectly affected by the park development plan as currently proposed;
- Prepare an updated inventory form for Coney Island of the West (CW-WAT-001) that includes a legible map (11x17) identifying all contributing features, photos, and other relevant information;
- With information from the Phase II survey and study, update the NRHP nomination documentation to reflect current understanding of the historic property's significance based upon new information;
- Incorporate archaeological and historical site information into the Master Plan for park development;
- Redesign current park development plans to avoid and preserve archaeological and historical features;
- Develop appropriate interpretation for selected locations; and
- Develop and implement a park management plan for continued stewardship of this historic property once the park has been established.

Prior to, or concurrent with the other steps, we recommend that the safety issues of the collapsed buildings be addressed. A consulting historical archaeologist can provide guidance on foundations/features that should be preserved once building debris is removed. Consultation with our office should occur, for each location, regarding appropriate methods and documentation.

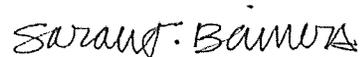
Also, consideration and careful planning should be taken regarding paths for construction equipment on site during clean-up phases in order to avoid inadvertent damage to archaeological sites or historical features. Debris can be hand carried to staging areas if necessary, and/or mechanical removal can occur when the ground is frozen. The National Park Service's Voyageurs National Park has extensive experience with this process, through that agency's removal of 20th century cabins and houses that were built on archaeological sites at island locations. We can provide contact information at Voyageurs if requested.

Also, Crow Wing County has been developing the recently NRHP-listed Milford Mine site into a park. The Milford Mine historic property has historic and archaeological characteristics similar to what is found at Coney Island of the West. Crow Wing County would be a good source of information for this project as well and we can provide contact information.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

We look forward to further consultation on this project. If you have any questions regarding our review, please contact me at 651-259-3456 or sarah.beimers@mnhs.org.

Sincerely,

A handwritten signature in black ink that reads "Sarah J. Beimers". The signature is written in a cursive, slightly slanted style.

Sarah J. Beimers, Manager
Government Programs and Compliance

cc: Steven Blondo, Blondo Consulting LLC