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Historical Society

MINNESOTA HISTORIC PRESERVATION OFFICE

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December 8, 2016

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 the opportunity to comment on the above project. Information received in our office on 7 November 2016 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.

David Mather, MnHPO National Register Archaeologist, has completed a review of your letter dated 31 October 2016 which included project documentation for the proposed park development project at Coney Island of the West. We appreciate Carver County Parks' initiation of consultation for the proposed project. Several staff from our office visited the site on June 14<sup>th</sup> this year, joining representatives of Carver County Parks and the Carver County Historical Society. That site visit was very helpful to our staff as it provided a good understanding of the property and its overall condition.

As you are aware, **Coney Island of the West** 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.

The historic property also has excellent potential for historical archaeology (the same historical context addressed in the original nomination) and also for Pre-Contact archaeology. It is our understanding that a Phase I survey has recently been completed and we look forward to reviewing that report. In our opinion, Coney Island of the West is an archaeological and historical treasure. The County's proposed development as a park, incorporating preservation of significant character-defining features and historical interpretation, is an appropriate use for the island, but it must be designed and executed with great care to protect the archaeological sites and historical landscape features.

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 Phase II intensive level survey and evaluation studies of the archaeological sites identified as part of the Phase I survey;
- With information from the Phase II survey, update the NRHP 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;
- Design park development 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. Documentation of current conditions should be completed as part of Phase II studies if it has not been done already. 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.

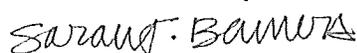
Also, consideration and careful planning should be taken regarding paths for construction equipment on site during clean-up phases in order to avoid inadvertent damage to archaeological sites or historical features. Debris can be hand carried to staging areas if necessary, and/or mechanical removal can 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 20<sup>th</sup> 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 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.

If you have any questions regarding our review of this project, please contact me at 651-259-3456 or sarah.beimers@mnhs.org.

Sincerely,



Sarah J. Beimers, Manager  
Government Programs and Compliance