



STATE AID FOR LOCAL TRANSPORTATION
De MINIMIS PRELIMINARY DETERMINATION REQUEST
For parks, recreation areas, wildlife or waterfowl refuges

Rev. July 2010

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SP: 164-090-015 _____ Federal Project No. __TA 6219(217) _____

Route: Indian Mounds Regional Park _____

From: Mounds Boulevard & Commercial Street

To: Burns Ave & US Hwy. 61 and County Hwy. 36/Warner Rd

Proposed Improvement: 3 miles of trail improvements including pavement replacement, trail realignment, and trail removal, pedestrian curb replacement (for ADA compliance), aggregate base maintenance, vegetation clearing, grading, trail signage, trail lighting, drinking fountain, and benches.

Environmental Document anticipated: Project Memo (PM)

Project Manager Name: Brett Hussong
Title: Project Manager and Lead Landscape Architect
Address: City of Saint Paul
400 City Hall Annex, 25 West Fourth Street
Phone: 651-266-6420
Email: brett.hussong@ci.stpaul.mn.us

This project will impact the following Section 4(f) property.

1. Description of The Section 4(f) Property.

Name: Indian Mounds Regional Park

Size (acre): 135 acres

Location: Saint Paul, MN

Ownership: City of Saint Paul

Type of Section 4(f) Property: Park and Historic Resource - see MnDOT CRU letter to SHPO (Attachment 4) and the project map (Attachment 5) for a list of and the locations of Historic Resources.

Function of or Available Activities on the Property: Multi-use (biking and walking) trails, Native American burial mounds, benches, overlooks, playground, tennis courts, restroom facilities, picnic areas with shelters and BBQ grills

Description and Location of Existing and Planned Facilities: As shown on the attached map, trails span the length of Indian Mounds Regional Park, totaling approximately 3 miles of multi-use trails. Some of the trails are interior to the park, offering circulation within the park and to overlooks. Approximately 1.9 miles of trail serve as the key corridors for direct connection to other trail segments outside of Indian Mounds Regional Park. In that regard, the trail segments that run adjacent to Mounds Boulevard and Burns Avenue serve as the backbone of the Indian Mounds Regional Park trail network.

Planned improvements include reconstruction of a majority of the trail network within Indian Mounds Regional Park. Some internal circulation trail segments will be removed and restored to natural ground cover. The reconstruction will generally be done immediately



within the footprint of the existing trail. Doing so helps to reduce the impact of the project by limiting the amount of earthwork and disturbance necessary to improve the trails. Some portions will be modified or slightly realigned in order to achieve Americans with Disabilities Act (ADA) standards.

Access: Mounds Boulevard and Burns Avenue are streets that run adjacent to the park boundaries, providing the primary access to parking lots and park facilities. Sidewalks from the adjacent residential neighborhood also provide pedestrian access to the park. The trail running through Indian Mounds Regional Park connects to a larger regional trail system including access to downtown Saint Paul. The bluff line of the Mississippi River valley forms a natural barrier preventing access points other than through those identified above.

Usage: Per estimates from the Metropolitan Council (2014), Indian Mounds Regional Park receives over 344,000 visits annually.

Relationship to Other Similarly Used Lands in the Vicinity: The Indian Mounds trail links to multiple parks and related trails in the surrounding area, including the Bruce Vento Nature Sanctuary and Bruce Vento Regional Trail, Swede Hollow Park, the Sam Morgan Regional Trail, Lower Landing Park, Battle Creek Regional Park and Battle Creek Trail, Pig's Eye Regional Park, and the Grand Round bikeway system.

Applicable Clauses Affecting Ownership: N/A

Unusual Characteristics Reducing or Enhancing the Value of the Property: several historic properties and protected resources exist within the park boundaries, including historic districts, one grouping of American Indian burial mounds listed in the National Register of Historic Places (NRHP), another grouping of mounds determined to be eligible for listing on the NRHP (for purposes of this review), and the Mounds Park Rotating Airport Beacon which is determined eligible for the NRHP.

LAWCON Section 6(f) (or other Federal Encumbrances) Impacts: Not Applicable

2. Impacts to the Section 4(f) Property.

Amount of land impacted: 5.17 acres; this total represents the sum of all lands disturbed by construction activities. The majority of construction will consist of removal of existing trail pavement, re-setting of existing aggregate base, and placement of new pavement. The majority of these improvements represent a replacement of trail in the same location of existing trail; that is, no new impact area beyond the immediate footprint of the trail. Some locations require a slightly realigned trail route that does result in disturbance of currently vegetated park space. These replacements and localized realignments improve trail use by repairing damages to the current trail and help achieve design standards for safer use of the trail network. Some trail segments will also be removed as a measure to demonstrate greater sensitivity to the historic resources that are known to be within Indian Mounds Regional Park, while also taking care to preserve the circulation needs for the park.

A more detailed description of anticipated construction activities is provided in the attached letter from the Minnesota Department of Transportation Cultural Resources Unit (CRU).



Permanent R/W Acquisition/Easements: N/A

Temporary Easements: N/A

Functions Affected: Temporary construction impacts may require short detours for users of the trail; trail removals will result in minor modifications to travel patterns within the park. Access to scenic overlooks will be maintained, and overgrown vegetation (including small trees) will be selectively removed to maintain the visual setting.

Facilities Affected: Trails and sidewalk connections will be made ADA compliant. Reconstructed trails will have an improved pavement surface for multi-modal use.

3. Coordination with Responsible Official with Jurisdiction Over the Section 4(f) Property:

Due to the unique nature of this park, there are two Section 4(f) Officials with Jurisdiction (OWJ) over Indian Mounds Regional Park.

The City of Saint Paul is the OWJ relative to the park functions; the attached letter from the City is specific to the activities, features, and attributes that are important to Indian Mounds Regional Park as a Park.

The Minnesota State Historic Preservation Office (SHPO) is the identified OWJ relative to the historic functions of the resource; the attached letter from CRU initiated consultation with SHPO for agreement on CRU's finding that the project will have no adverse effects. Section 4(f) coordination with SHPO is conducted through this consultation process. Reconciliation of the historic review process will also result in agreement from SHPO regarding the De minimis determination. The attached letter from SHPO is specific to the activities, features, and attributes that are important to Indian Mounds Regional Park as a historic resource.

4. Considerations.

Impact Avoidance: Several design exceptions (deviations from design standards) have been incorporated into the design of the trail reconstruction in order to reduce impacts of the project. Trail removals have been incorporated into the project design partly in response to concerns about the relationship to existing known and unidentified historic and cultural resources. That is, the proximity of trails to resources may be perceived by some park users as enabling access to historic resources. Trail modifications have also been made in a manner that is sensitive to natural resources such as trees, which may be habitat for threatened bat species.

Planning to minimize harm: The City of Saint Paul has coordinated with tribal representatives to modify the proposed project and prepare for construction activities in a way that minimizes impact. In addition to minimizing the disruption of earth (e.g. leaving existing gravel substrate in place and reusing it as the base for new pavement), the City is also committed to ongoing coordination with tribal



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The City's construction documents will also identify areas where the construction contractor is permitted to work, including locations where the construction zone can be accessed. Areas that are off-limits to the construction team will be identified in coordination with tribal and park stakeholders.

Coordination with SHPO is ongoing for completion of the Section 106 determination. Measures to minimize and avoid harm are in development and will be formalized through the Section 106 process. For example, the project team currently anticipates that before construction will be allowed to proceed shovel testing will be done at areas prescribed by CRU. Should additional historic properties be identified, CRU will re-initiate consultation with consulting parties.

As requested in the Endangered Species Act - Section 7 consultation, the City will require winter tree removal to occur during the November 1 to March 31 time-frame to avoid threatened bat species habitat disturbance.

Mitigation: In locations where the paved trails are removed, the City will replace the trail with a combination of walking surfaces (such as crushed gravel) and vegetation to retain some of the wayfinding features of some trails and to guide foot traffic to concentrated locations that are sensitive to known or potential natural and historic resources.

Enhancement: This project fundamentally represents an enhancement to the existing recreational resource by reconstructing the trail to provide a safer, more reliable surface for all users. Additionally, ADA access will be added to the park connections, further enhancing accessibility to the park.

Recommended:

Local Agency Engineer

Paul F. Kurtz

Date 4-23-2019

for District State Aid Engineer

Catherine H. ...

Date 4/26/2019

for State Aid Engineer

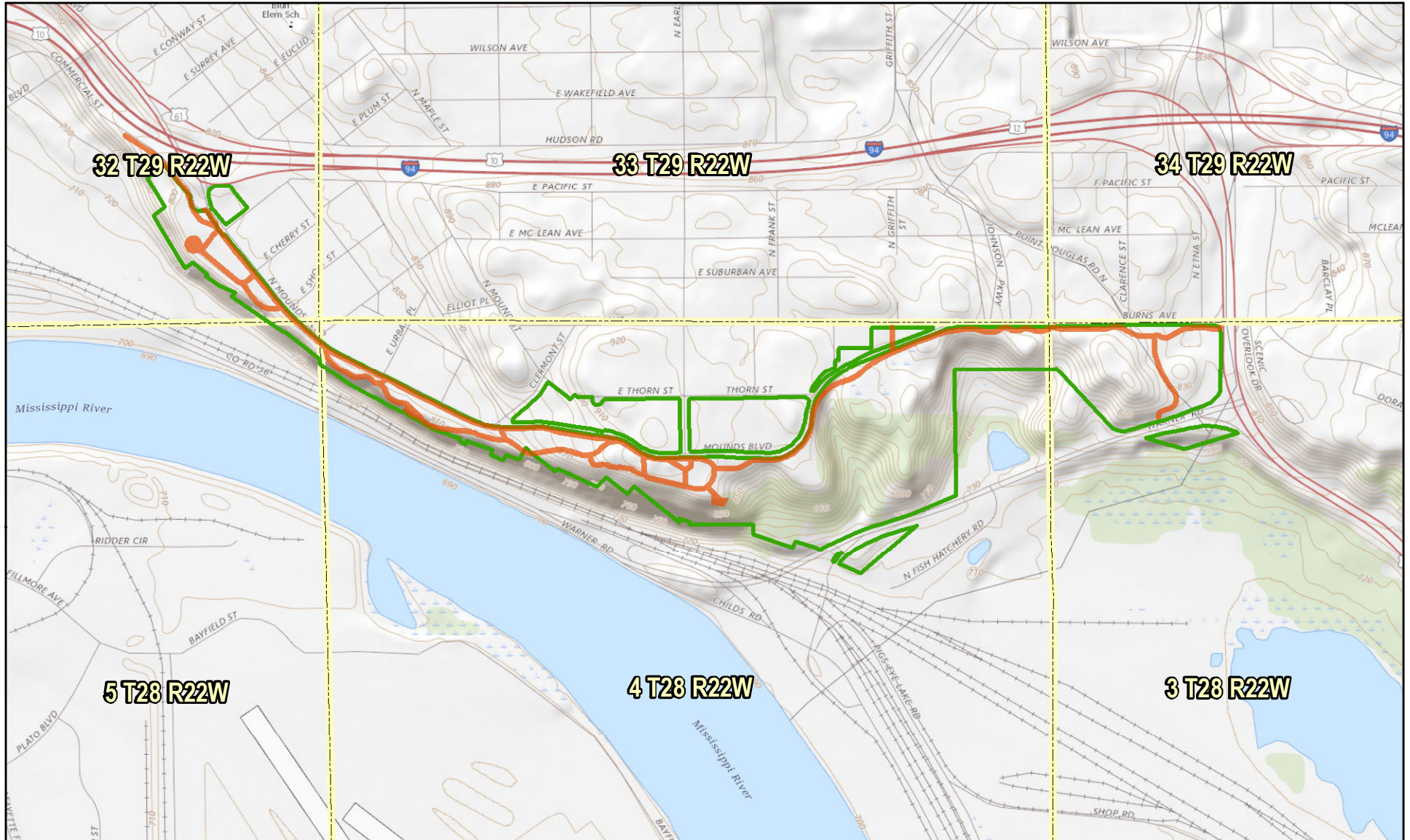
Dynette J. ...

Date 5/01/19

Preliminary Approval conditioned on results of public notice & comment period: FHWA

Engineer _____

Date 5/14/2019





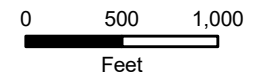
**2018 Indian Mounds Regional Park
Trail Reconstruction (SP 164-090-015)**

**City of Saint Paul
Parks and Recreation**

Saint Paul, Ramsey County

Legend

-  Project Area
-  Indian Mounds Park



DEPARTMENT OF PARKS AND RECREATION
Michael Hahm, CPRP - Director



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Mayor Melvin Carter

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March 19, 2019

Mr. Brett Hussong
Project Manager and Lead Landscape Architect
City of Saint Paul
400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102

Subject: Indian Mounds Regional Park Trail Improvements
Saint Paul, Ramsey County, Minnesota

Dear Mr. Hussong:

The City of Saint Paul would like to express its support for the Indian Mounds Regional Park Trail Improvements project. The City is aware that the proposed improvements will result in some impacts to land at Indian Mounds Regional Park, which is owned by the City of Saint Paul. The impact is thereby covered by Federal Highway Administration regulations codified at 23 CFR Part 774, commonly referred to as Section 4(f). The City understands that the proposed improvements are within the boundaries of the park. While the improvements will not result in acquisition of land, some changes to the trail function will occur.

The City of Saint Paul believes the proposed improvements will not have a negative impact to the recreational functions of the park or its features. The City is therefore supportive of the proposed project to reconstruct the trail system at Indian Mounds Regional Park. As part of the project, some segments of the park's trail system will be removed and access points to the trail will be made compliant with the Americans with Disabilities Act (ADA) design standards. The City anticipates the project will improve mobility and safety for users of the trail system and the park.

Sincerely,

Mike Hahm, Director, CPRP
Department of Parks and Recreation

c: Parks Design

A. Messer

AFM



CAPRA Accreditation

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National Gold Medal Award