



Minneapolis Park & Recreation Board

Administrative Offices

2117 West River Road North
Minneapolis, MN 55411-2227

Northside Operations Center

4022 1/2 North Washington Avenue
Minneapolis, MN 55412-1742

Southside Operations Center

3800 Bryant Avenue South
Minneapolis, MN 55409-1000

Phone

612-230-6400

Fax

612-230-6500

www.minneapolisparcs.org

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Meg Forney

Vice President

Alicia D. Smith

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01 February 2023

State Historic Preservation Review Board

c/o Amy Spong DSHPO

50 Sherburn Ave.

Suite 203

Saint Paul, MN 55155

Submitted via email to Amy Spong, Deputy State Historic Preservation Officer, Amy.Spong@state.mn.us

RE: Minneapolis Park and Recreation Board Comments Regarding the Nomination of Hiawatha Golf Course to the National Register of Historic Places

Nomination Applicant: The Bronze Foundation, via Hess Roise and Company

Dear State Historic Preservation Review Board and National Park Service staff:

The Minneapolis Park and Recreation Board (MPRB) appreciates the opportunity to allow the public, interested agencies, and the landowner to review and comment on the Bronze Foundation's nomination of Hiawatha Golf Course to the National Register of Historic Places. This letter contains the MPRB's comments related to the pending nomination. For context, the MPRB was organized through an act of the Minnesota legislature in 1883 and is responsible for parks in the City of Minneapolis and it also owns and operates parkland in six other cities.

Specific to the pending nomination, the MPRB has owned and operated parkland at Lake Hiawatha since 1922. After several years of property assembly and planning, Theodore Wirth, superintendent of parks, determined to dredge Rice Lake (known by the Dakota as Bde Psin). Rice Lake was a shallow waterbody and part of an extensive wetland system in a relatively undeveloped portion of Minneapolis. In 1929, Wirth commenced a dredging operation that would shape a new lake from the former Rice Lake and create new "dry land" for a golf course using dredged materials. While the changes were then viewed as an improvement, it occurred without regard for the ecology of the lake and the creek, which flowed through it. While those changes were ecologically significant, the long-term conditions would result in the golf

Accredited



since 2010

course being situated at an elevation lower than the adjacent lake, requiring pumping of groundwater sufficient to supply the domestic water needs of a small to medium-sized Minnesota town, and placing the golf course at a one-in-ten chance of flooding every year. Wirth's actions supported the expansion of the park system with new amenities serving portions of Minneapolis' growing populace but the despoilation of a natural lake, the elimination of significant wetlands, and the loss of expansive habitat would never be allowed today.

Upon realizing the extensive pumping of groundwater required to sustain land dry enough for a golf course, the MPRB embarked on a series of investigations and eventually drafted a master plan for the golf course property. Recognizing the lack of long-term sustainability for the golf course, the master plan seeks to restore, to the degree practicable, the ecology of the Bde Psin while retaining certain recreational amenities and expanding the opportunities to create others—following Wirth's goal of providing those experiences for a continually growing and more diverse Minneapolis population. The investment by the MPRB will be significant, but the goals are clear:

- the lake will be improved by removing floatable trash and other pollutants that result in today's listing of Lake Hiawatha as impaired;
- the golf course will be retained but changed so that it is less impacted by potential flooding and so that it will recover from flooding more quickly when those events occur;
- habitat, much diminished by the current golf course, will be expanded;
- there will be opportunities to celebrate the site's history and tell the stories of heroic Black golfers as well as centuries of Indigenous use prior to European settlement in Minneapolis; and
- the property will be more accessible to more people than ever before, which is especially important considering the MPRB's obligation to provide recreational and natural experiences for Minneapolis residents and visitors.

While the site presents a complex hydrology, an understanding of the impacts of groundwater pumping is critical. Following extensive flooding of the golf course property in 2014, the MPRB understood it was pumping an estimated 240 million gallons of groundwater from the property without proper permission from the Minnesota Department of Natural Resources. The MPRB continued to study groundwater conditions, eventually recognizing the pumped volume of groundwater, now being measured by the MPRB and temporarily permitted by the MnDNR, exceeded 300 million gallons in one year and 400 million gallons in a subsequent year. For the Board of Commissioners, this was key in its determination that a master plan was necessary, one that would yield a reduction in the pumped volume of groundwater while retaining an ecologically driven and flood resilient golf course of at least nine holes.

The master plan was completed in February 2021 and adopted in September 2022 by the Board of Commissioners. It was following the master plan's completion that the Bronze Foundation, learning that the new direction would bring changes to the golf course, initiated its National Register nomination process.

The MPRB generally agrees with the assessment, study, and data collected by Hess Roise, and Company for the Bronze Foundation's nomination. However, portions of the work are inconsistent or incorrect. The MPRB requests the following data be considered, adjusted, or added:

1. Geographical Data, Page 9 and Verbal Boundary Description, Page 10 of PDF application: The applicant notes the site is 148 acres. The MPRB requests the site area be adjusted to only include areas within the existing golf course fence, plus the clubhouse and parking lot. The fenced area, including clubhouse and parking lot equates to about 138 acres. *Attachment A* shows the suggested site boundary.
2. Narrative Summary, page 12 of PDF application: Though the golf course layout has not substantially changed, it should be noted that many of the original bunkers have been filled, several trees were

removed due to flooding impacts, berms were installed to reduce flooding impacts, sump pumps and underground drainage systems were installed, and the practice greens and hole 18 were rebuilt in 1999. Originally, the putting green wrapped around the side of the clubhouse building. To remain attractive to golfers, these changes—and others—were viewed as necessary. Some changes, like the creation of a berm to vertically separate the golf course from the lake were accomplished prior to regulations regarding impacts to the waters of the state and may have impacted floodplains for areas along Minnehaha Creek. *Attachment B* shows berms between Minnehaha Creek and the golf course.

An important item to note: the golf course has subsided significantly, meaning there has been a vertical change in portions of the site's elevation since dredging and filling activities in 1929 and 1930. The golf course lays atop what was assumed, perhaps, to be stable lands created by dredging of organic soils from Rice Lake. The placement of dredged soils on top of in situ organic soils, results in subsidence which experts suggest continues to this day. About one-fourth of the golf course property is now lower in elevation than the ordinary high-water elevation of adjacent Lake Hiawatha, creating a condition during flood events requiring removal of not only groundwater by pumping but also any flood waters that might have overtopped the berm. Subsidence of the land is also evident where the ground is now draped over a linear hump on the north side of Lake Hiawatha. The hump is formed by a large underground storm sewer pipe that rests on piles, its elevation unaffected by the subsidence of lands around it. *Attachment C* shows the storm sewer pipe "hump" and *Attachment D* is a map indicating low laying areas.

3. Minneapolis's Municipal Golf Courses, Page 28 of PDF application: Meadowbrook Golf Course is in Hopkins, St. Louis Park, and Edina, not just Hopkins.
4. Maps on Page 80 and 82 of PDF application: The boundary should be shown as the fenced area plus the clubhouse and parking lot. The site should not include those areas outside the golf course fence generally near the intersections of East 43rd Street and 19th Avenue South, and East 44th Street and Longfellow Avenue. Those areas have consistently been directed to non-golf course use supporting

local recreation. The underground pipes shown in the map on page 82 are not accurate and not fully represented. The “Other feature” triangle symbol in the Legend in the map on page 82 is not shown anywhere in the map, and Longfellow Avenue is not labeled.

5. It is important to note there is no indication of the groundwater pumping or drainage systems that are relevant to the perpetuation of the site as a golf course and the modifications made to the site to attempt to ward off flooding over the last several decades. *Attachment E* is a diagram of pumping and drainage systems currently in place.

The MPRB and members of the community have spent the last several years crafting the [Parks for All Comprehensive Plan](#). It establishes an updated mission, vision, values, goals and strategies, and implementation plans and metrics to better serve the city and its visitors in ways that are holistically different than in the past. Two goals outlined within the Comprehensive Plan are directly related to the Bronze Foundation’s application and are intended to guide the MPRB in its own cultural preservation and implementation efforts:

- The first goal is to “foster belonging and equity.” The MPRB has developed 24 strategies to advance the organization toward that goal. Of those, connecting stories of park histories with stories of today, amplifying indigenous stories, and sharing narratives and elevating voices through creative placemaking and cultural programs are essential elements within the Hiawatha Golf Course Area Master Plan.
- The second goal is to “steward a continuum of nature and recreation.” One of the 14 strategies in support of this goal is the prioritization of the preservation of historic, cultural and scenic resources with protection of natural resources and contemporary recreational needs in park management, design, implementation, interpretation, and development decisions.

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This strategy requires careful balance, a key element of the Hiawatha Golf Course Area Master Plan.

The adopted [Hiawatha Golf Course Area Master Plan](#) and [Nokomis-Hiawatha Regional Park Master Plan](#) are wholly aligned with these goals and their supportive strategies.

Though the MPRB largely agrees with the history represented within the Bronze Foundation's application, there are other histories on this site worth sharing, including Indigenous histories extending back thousands of years. The master plan represents a balance of nature and recreation, and a balance for Black golfers, where the golf course is modified but retained, and Indigenous peoples, where a process of healing and restoration is proposed to reestablish, as best as the MPRB is able, the ecology of Bde Psin. Without a balance and without compromise, the historic resources noted in the National Register nomination are at risk of inundation or flooding—or both. The master plan reduces the risk of loss while maintaining nine holes of golf on the site and allowing for certain areas of the property to be inundated similarly to its landscape prior to European settlement and dredging. The master plan anticipates periodic inundation of the property, responding in ways the MPRB believes are ecologically appropriate and in ways that perpetuate a recreation resource that has existed on the property for almost a century.

The MPRB is also obligated to reestablish its permit with the Minnesota Department of Natural Resources for removing groundwater from the property. The master plan sets a new water management solution for the property that allows for portions of the golf course to be retained but requires other portions to be modified to accommodate the unique hydrologic conditions of the property. Importantly, the Bronze Foundation considered solutions to those conditions (one of which would have eliminated Lake Hiawatha from the “City of Lakes” and used reclaimed lands not just to preserve the golf course but to expand it). To date, no entity has developed a solution that allows for the perpetuation of an 18-hole golf course while addressing the water issues unique to this property.

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While the MPRB appreciates the depth of research provided in the pending nomination, parklands in Minneapolis must also accommodate the ever-expanding needs of the population for recreation and natural spaces. The MPRB has policy guidance recognizing an appropriate role for historic resources within parkland under its jurisdiction. At the same time, the MPRB's mission directs attention to ecology and the need to actively address climate change. These are particularly vexing concerns at the Hiawatha Golf Course, where the presence of groundwater and the potential for flooding put significant portions of the property at risk. Having the golf course recognized as a National Register property but not being able to manage groundwater puts the golf course and its rich history at greater risk. This is precisely why the MPRB engaged in an extensive planning process for the golf course, where recreation, ecology, and history are recognized and, importantly, perpetuated for all communities served by the MPRB.

The MPRB wishes to thank the Bronze Foundation for their efforts to preserve an important piece of history in our park system.

Sincerely,

Margret Forney, President

Attachments

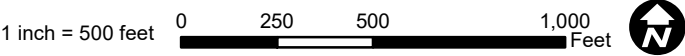
Attachment A – Suggested Site Boundary Map
Attachment B – Berms Near Minnehaha Creek
Attachment C – Storm Sewer “Hump” Photos
Attachment D – Low Areas Map
Attachment E – Pumping and Drainage Systems Diagrams



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Legend

 Suggested Site Boundary (138.8 Acres)



Attachment A – Suggested Site Boundary Map



Attachment B – Berms Near Minnehaha Creek



Attachment C - Storm Sewer "Hump" Photos

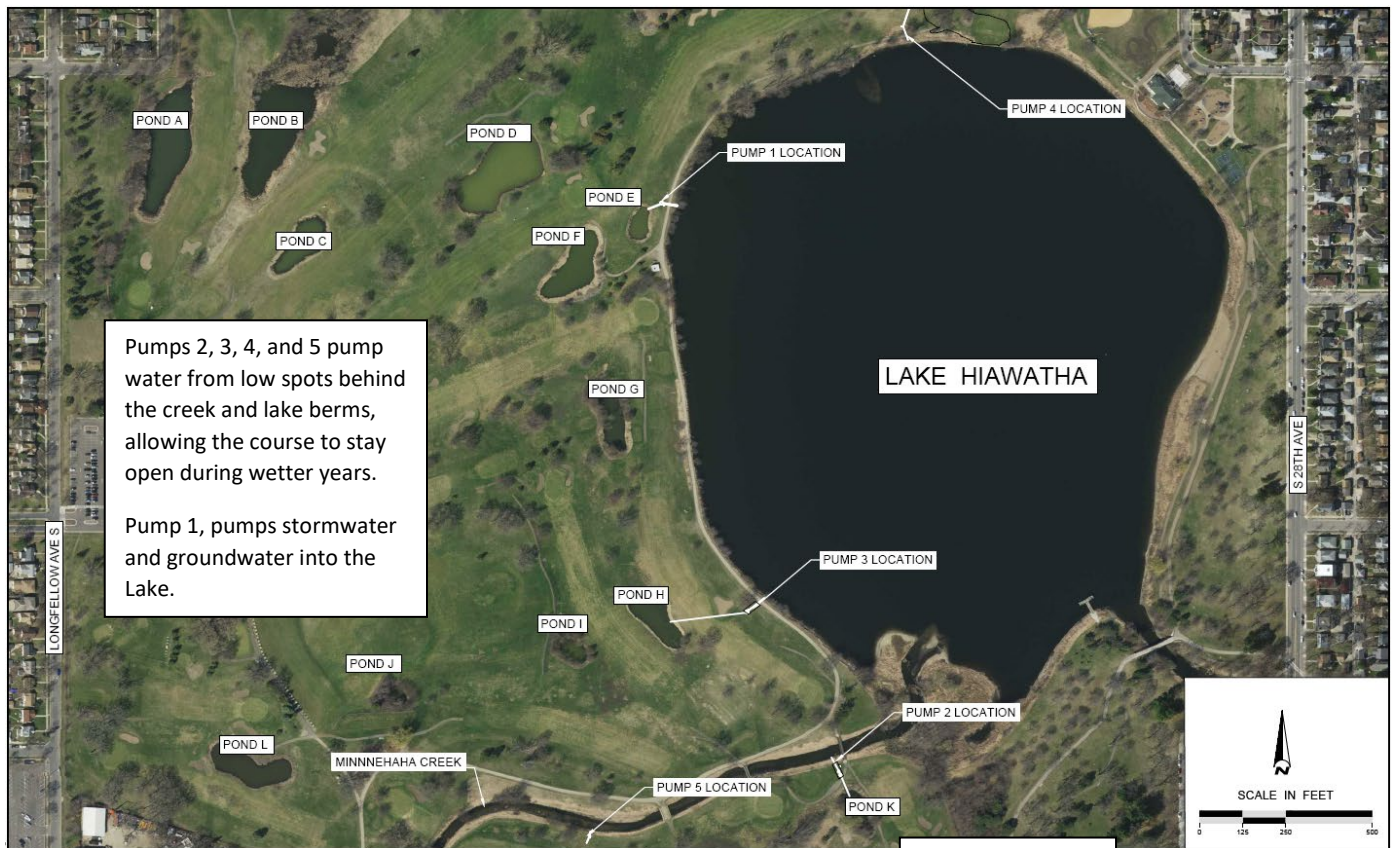


1 inch = 500 feet 0 250 500 1,000 Feet

Legend

- Suggested Site Boundary (138.8 Acres)
- 0.2% Annual Chance of Flood (FEMA)
- 1% Annual Chance of Flood (FEMA, 817')
- At or Below Elevation of Lake (\leq 812.8 OHWM for Lake Hiawatha, 33 Acres)

Attachment D - Low Areas Map



Attachment E – Drainage and Pumping Systems Diagrams