

**Appendix B**  
Department of Natural Resources and State Historical Preservation Office  
Correspondence



## Minnesota Department of Natural Resources

Natural Heritage and Nongame Research Program, Box 25

500 Lafayette Road

St. Paul, Minnesota 55155-40  
Phone: (651) 259-5109 Fax: (651) 296-1811 E-mail: lisa.joyal@dnr.state.mn.us

April 04, 2007

Mr. Brian Connolly  
WSB & Associates, Inc.  
701 Xenia Ave. South, Suite 300  
Minneapolis, MN 55416

Re: Request for Natural Heritage information for vicinity of proposed Gateway AUAR, T28N R24W Section 21, Hennepin County  
NHNRP Contact #: ERDB 20070643

Dear Mr. Connolly,

The Minnesota Natural Heritage database has been reviewed to determine if any rare plant or animal species or other significant natural features are known to occur within an approximate one-mile radius of the area indicated on the map enclosed with your information request. Based on this review, there are 4 known occurrences of rare species or native plant communities in the area searched. For details, please see the enclosed database printouts and the explanation of selected fields.

The Natural Heritage database is maintained by the Natural Heritage and Nongame Research Program, a unit within the Division of Ecological Services, Department of Natural Resources. It is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. Its purpose is to foster better understanding and protection of these features.

Because our information is not based on a comprehensive inventory, there may be rare or otherwise significant natural features in the state that are not represented in the database. A county-by-county survey of rare natural features is now underway, and has been completed for Hennepin County. Our information about native plant communities is, therefore, quite thorough for that county. However, because survey work for rare plants and animals is less exhaustive, and because there has not been an on-site survey of all areas of the county, ecologically significant features for which we have no records may exist on the project area.

The enclosed results of the database search are provided in two formats: short record report and long record report. To control the release of locational information, which might result in the damage or destruction of a rare element, both printout formats are copyrighted.

The short record report provides rare feature locations only to the nearest section, and may be reprinted, unaltered, in an Environmental Assessment Worksheet, municipal natural resource plan, or report compiled by your company for the project listed above. If you wish to reproduce the short record report for any other purpose, please contact me to request written permission. **The long record report includes more detailed locational information, and is for your personal use only. If you wish to reprint the long record report for any purpose, please contact me to request written permission.**

Please be aware that review by the Natural Heritage and Nongame Research Program focuses only on *rare natural features*. It does not constitute review or approval by the Department of Natural Resources as a whole. If you require further information on the environmental review process for other natural resource-related issues, you may contact your Regional Environmental Assessment Ecologist, Wayne Barstad, at (651) 772-7940.

DNR Information: 651-296-6157 • 1-888-646-6367 • TTY: 651-296-5484 • 1-800-657-3929

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An invoice in the amount of \$67.08 will be mailed to you under separate cover within two weeks of the date of this letter. You are being billed for map and database search and staff scientist review. Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources.

Sincerely,



Lisa A. Joyal  
Endangered Species Environmental Review Coordinator

encl: Database search results  
Rare Feature Database Print-Outs: An Explanation of Fields

Minnesota Natural Heritage & Nongame Research Program  
 Short Record Report of Element Occurrences within 1 mile radius of:  
 Edina Gateway AUAR  
 T28N R24W Section 31  
 Hennepin County

Element Name and Occurrence Number	Federal Status	MN Status	State Rank	Global Rank	Last Observed Date
<b>Hennepin County, MN</b>					
<u>Emydoidea blandingii</u> (Blanding's Turtle) #479 Location Description: T28N R24W S31		THR	S2	G4	1989-08-25
<u>Emydoidea blandingii</u> (Blanding's Turtle) #679 Location Description: T28N R24W S29, T28N R24W S34, T28N R24W S33, T27N R24W S4, T27N R24W S3, T28N R24W S32, T28N R24W S27, T28N R24W S28		THR	S2	G4	1993-05-07
<u>Falco peregrinus</u> (Peregrine Falcon) #91 Location Description: T27N R24W S5	No Status	THR	S2B	G4	2006-06
<u>Gallinula chloropus</u> (Common Moorhen) #2 Location Description: T27N R24W S8, T27N R24W S6, T27N R24W S5, T27N R24W S7	No Status	SPC	S3B	G5	1972-07-

Records Printed = 4

The Natural Heritage & Nongame Research Program recently adopted a new database system called Biotics. As a result of this change, the layout and contents of the database reports have been revised. Many of the fields included in the new reports are the same or similar to the previous report fields, however there are several new fields and some of the field definitions have been slightly modified. We recommend that you familiarize yourself with the latest field explanations.

## Rare Features Database Reports: An Explanation of Fields

The Rare Features database (Biotics) is part of the Natural Heritage Information System, and is maintained by the Natural Heritage and Nongame Research Program, a unit within the Division of Ecological Services, Minnesota Department of Natural Resources (DNR).

*\*\*Please note that the print-outs are copyrighted and may not be reproduced without permission\*\**

**Field Name:** [Full (non-abbreviated) field name, if different]. Further explanation of field.

-E-

**Element Name and Occ #:** [Element Name and Occurrence Number]. The Element is the name of the rare feature. For plant and animal species records, this field holds the scientific name followed by the common name in parentheses; for all other elements (such as native plant communities, which have no scientific name) it is solely the element name. Native plant community names correspond to Minnesota's Native Plant Community Classification (Version 2.0). The Occurrence Number, in combination with the Element Name, uniquely identifies each record.

**EO Data:** [Element Occurrence Data]. For species elements, this field contains data collected on the biology of the Element Occurrence\* (EO), including the number of individuals, vigor, habitat, soils, associated species, peculiar characteristics, etc. For native plant community elements, this field is a summary text description of the vegetation of the EO, including structure (strata) and composition (dominant/characteristic species), heterogeneity, successional stage/dynamics, any unique aspects of the community or additional noteworthy species (including animals). Note that this is a new field and it has not been filled out for many of the records that were collected prior to conversion to the new database system. Some of the information meeting the field definition may be found in the General Description field.

**EO ID#:** [Element Occurrence Identification Number]. Unique identifier for each Element Occurrence record.

**EO Rank:** [Element Occurrence Rank]. An evaluation of the quality and condition of an Element Occurrence (EO) from A (highest) to D (lowest). Represents a comparative evaluation of: 1) quality as determined by representativeness of the occurrence especially as compared to EO specifications and including maturity, size, numbers, etc. 2) condition (how much has the site and the EO itself been damaged or altered from its optimal condition and character). 3) viability (the long-term prospects for continued existence of this occurrence - used in ranking species only). EO Ranks are assigned based on recent fieldwork by knowledgeable individuals.

**Extent Known?:** A value that indicates whether the full extent of the Element is known (i.e., it has been determined through field survey) at that location. If null, the value has not been determined.

-F-

**Federal Status:** Status of species under the U.S. Endangered Species Act: LE = endangered; LT = threatened; LE,LT = listed endangered in part of its range, listed threatened in another part of its range; LT,PDL = listed threatened, proposed for delisting; C = candidate for listing. If null or "No Status" the species has no federal status.

**First Observed Date:** Date that the Element Occurrence was first reported at the site in format YYYY-MM-DD. A year followed by "Pre" indicates that the observed date was sometime prior to the date listed, but the exact date is unknown.

-G-

**General Description:** General description or word picture of the area where the Element Occurrence (EO) is located (i.e., the physical setting/context surrounding the EO), including a list of adjacent communities. When available, information on surrounding land use may be included. Note that the information tracked in this field is now more narrowly defined than it was in the old database system, and some of the information still in this field more accurately meets the definition of the new EO Data field. We are working to clean up the records so that the information in the two fields corresponds to the current field explanations described herein. Also note that the use of uppercase in sentences in this field is not significant but rather an artifact of transferring data from the old database system to the new system.

**Global Rank:** The global (i.e., range-wide) assessment of the relative rarity or imperilment of the species or community. Ranges from G1 (critically imperiled due to extreme rarity on a world-wide basis) to G5 (demonstrably secure, though perhaps rare in parts of its range). Global ranks are determined by NatureServe, an international network of natural heritage programs and conservation data centers.

-L-

**Last Observed Date:** Date that the Element Occurrence was last observed to be extant at the site in format YYYY-MM-DD.

**Last Survey Date:** Date of the most recent field survey for the Element Occurrence, regardless of whether it was found during the visit. If the field is blank, assume the date is the same as the Last Observed Date.

Location Description: County or Counties in which the Element Occurrence was documented followed by Township, Range, and Section information (not listed in any particular order). Each unique Township, Range, and Section combination is separated by a comma. In some cases, there are too many Township, Range, and Section combinations to list in the field, in which case, the information will be replaced with, "Legal description is too lengthy to fit in allotted space".

-M-

Managed Area(s): Name of the federally, state, locally, or privately managed park, forest, refuge, preserve, etc., containing the occurrence, if any. If this field is blank, the element probably occurs on private land. If "(Statutory Boundary)" occurs after the name of a managed area, the location may be a private inholding within the statutory boundary of a state forest or park.

MN Status: [Minnesota Status]. Legal status of plant and animal species under the Minnesota Endangered Species Law: END = endangered; THR = threatened; SPC = special concern; NON = tracked, but no legal status. Native plant communities, geological features, and colonial waterbird nesting sites do not have any legal status under the Endangered Species Law and are represented by a N/A.

-N-

NPC Classification (v1.5): Native plant community name in Minnesota's Native Vegetation: A Key to Natural Communities (Version 1.5). This earlier classification has been replaced by Minnesota's Native Plant Community Classification (Version 2.0).

-O-

Observed Area: The total area of the Element Occurrence, in acres, which is measured or estimated during fieldwork. If null, the value has not been determined.

Ownership Type: Indicates whether the land on which the Element Occurrence was located was publicly or privately owned; for publicly owned land, the agency with management responsibility is listed, if known.

-S-

Site Name: The name of the site(s) where the Element Occurrence is located. Sites are natural areas of land with boundaries determined and mapped according to biological and ecological considerations.

Survey Site #/Name: The name of the survey site, if applicable, where the Element Occurrence is located. Survey sites are sites that provide a geographic framework for recording and storing data, but their boundaries are not based on biological and ecological considerations. Minnesota County Biological Survey site numbers, if applicable, are also listed in this field.

Survey Type: Information on the type of survey used to collect information on the Element Occurrence.

Surveyor(s): Name(s) of the person(s) that collected survey information on the Element Occurrence.

State Rank: Rank that best characterizes the relative rarity or endangerment of the taxon or plant community in Minnesota. The ranks do not represent a legal status. They are used by the Minnesota Department of Natural Resources to set priorities for research, inventory and conservation planning. The state ranks are updated as inventory information becomes available. S1 = Critically imperiled in Minnesota because of extreme rarity or because of some factor(s) making it especially vulnerable to extirpation from the state. S2 = Imperiled in Minnesota because of rarity or because of some factor(s) making it very vulnerable to extirpation from the state. S3 = Vulnerable in Minnesota either because rare or uncommon, or found in a restricted range, or because of other factors making it vulnerable to extirpation. S4 = Apparently secure in Minnesota, usually widespread. S5 = Demonstrably secure in Minnesota, essentially ineradicable under present conditions. SH = Of historical occurrence in the state, perhaps having not been verified in the past 20 years, but suspected to be still extant. An element would become SH without the 20-year delay if the only known occurrences in the state were destroyed or if it had been extensively and unsuccessfully looked for. SNR = Rank not yet assessed. SU = Unable to rank. SX = Presumed extinct in Minnesota. SNA = Rank not applicable. S#S# = Range Rank: a numeric range rank (e.g., S2S3) is used to indicate the range of uncertainty about the exact status of the element. S#B, S#N = Used only for migratory animals, whereby B refers to the breeding population of the element in Minnesota and N refers to the non-breeding population of the element in Minnesota.

-V-

Vegetation Plot: Code(s) for any vegetation plot data that have been collected within this Element Occurrence (i.e., either Releve Number or the word "RELEVE" indicates that a releve has been collected).

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\* Element Occurrence – an area of land and/or water in which an Element (i.e., a rare species or community) is, or was, present, and which has practical conservation value for the Element as evidenced by potential continued (or historical) presence and/or regular recurrence at a given location. Specifications for each species determine whether multiple observations should be considered 1 Element Occurrence or 2, based on minimum separation distance and barriers to movement.

## Data Security

Locations of some rare features must be treated as sensitive information because widespread knowledge of these locations could result in harm to the rare features. For example, wildflowers such as orchids and economically valuable plants such as ginseng are vulnerable to exploitation by collectors; other species, such as bald eagles, are sensitive to disturbance by observers. For this reason, we prefer that publications not identify the precise locations of vulnerable species. We suggest describing the location only to the nearest section. If this is not acceptable for your purposes, please call and discuss this issue with the Endangered Species Environmental Review Coordinator for the Natural Heritage and Nongame Research Program at (651) 259-5107.

# History/Architecture

PROPERTY NAME	ADDRESS	Twp	Range	Sec Quarters	USGS	Report	NRHP	CEF	DOE	Inventory Number
COUNTY Sturges House	Hennepin 6813 Oaklawn Ave. ↳ NORTH OF PROJECT AREA	28	24	31 N-SW-SE	Minneapolis South					HE-EDC-0592
COUNTY Lock and Dam No. 2	Ramsey Mississippi River north of Lake Street/Marshal Ave. ↳ N/A ⇒ ST. PAUL	28	24	31 NE-NE-SE	St. Paul W		Y			RA-SPC-6003

**Brian Connolly**

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**From:** Cinadr, Thomas [thomas.cinadr@mnhs.org]  
**Sent:** Thursday, March 22, 2007 8:01 AM  
**To:** Brian Connolly  
**Subject:** RE: Historical & Archaeological Information Request  
**Attachments:** Historic3.doc

**THIS EMAIL IS NOT A PROJECT CLEARANCE.**

**This message simply reports the results of the cultural resources database search you requested. The database search produced results for only previously known archaeological sites and historic properties. Please read the note below carefully.**

**For further information contact Kelly Gragg-Johnson by phone at 651-259-3455 or email at [kelly.gragg-johnson@mnhs.org](mailto:kelly.gragg-johnson@mnhs.org).**

No historic properties were identified in a search of the Minnesota Archaeological Inventory and Historic Structures Inventory for the search area requested. A report containing the archaeological sites identified is attached.

The result of this database search provides a listing of recorded archaeological sites and historic architectural properties that are included in the current SHPO databases. Because the majority of archaeological sites in the state and many historic architectural properties have not been recorded, important sites or structures may exist within the search area and may be affected by development projects within that area. Additional research, including field survey, may be necessary to adequately assess the area's potential to contain historic properties.

With regard to Environmental Assessment Worksheets (EAW), a negative known site/structure response from the SHPO databases is not necessarily appropriate information on which to base a "No" response to EAW Question 25a. It is the Responsible Governmental Unit's (RGU) obligation to verify the accuracy of the information contained within the EAW. A "No" response to Question 25a without written justification should be carefully considered.

If you require a comprehensive assessment of a project's potential to impact archaeological sites or historic architectural properties, you may need to hire a qualified archaeologist and/or historian. Please contact the SHPO by phone at 651-296-5434 or by email at [mnshpo@mnhs.org](mailto:mnshpo@mnhs.org) for current lists of professional consultants in these fields. For further questions on the review process contact the Reviews Department at 651-259-3450.

The Minnesota SHPO Survey Manuals and Database Metadata can be found at <http://www.mnhs.org/shpo/survey/inventories.htm>

*Tom Cinadr*  
Survey and Information Management Coordinator  
Minnesota State Historic Preservation Office  
Minnesota Historical Society  
345 Kellogg Blvd. West  
St. Paul, MN 55102

651-259-3453 (voice)  
651-282-2374 (fax)

-----Original Message-----

**From:** Brian Connolly [mailto:bconnolly@wsbeng.com]  
**Sent:** Tuesday, March 20, 2007 2:45 PM  
**To:** Cinadr, Thomas  
**Subject:** Historical & Archaeological Information Request

Mr. Cinadr:

My name is Brian Connolly, and I am working on an Alternative Urban Areawide Review (AUAR) for the City of Edina. I am looking for historical and archaeological database information for the following area:

Hennepin County  
City of Edina  
T28N, R24W.  
South ½ of Section 31

Any help would be greatly appreciated. Thanks!

~Brian

Brian D. Connolly  
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Minneapolis, MN 55416

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# MEMORANDUM

17 September 2007

**TO:** Cary Teague, Planning Director  
Joyce Repya, Associate Planner (HPB staff)  
**FR:** Robert Vogel, Preservation Planning Consultant  
**RE:** Heritage Resources Assessment of the Gateway Study Area

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Per your request, I conducted a preliminary heritage resources assessment of the Pentagon Park of Edina office complex located at Highway 100 and 77<sup>th</sup> Street West. The purpose of this investigation was to identify and gather information on potential heritage preservation resources in the Gateway Study Area.

The investigation was conducted at the reconnaissance level and involved limited background documentary research as well as a "windshield survey" of the study area designed to provide me with a general idea of the distribution of buildings and their architectural characteristics.

## Architectural Information

The Pentagon Park office complex comprises sixteen freestanding buildings that were constructed in phases between 1963 and 1970. Except for the low-rise office tower and the cluster of office buildings located west of Computer Avenue, the buildings are arranged in an orthogonal pattern, and a large portion of the ground surface within the project area boundaries is covered by pavement. Architecturally, the entire ensemble is a carefully composed set of Modernist-influenced architectural and landscape components typical of corporate office park complexes from the postwar period.

The office tower at 4940 Viking Drive, which provides the visual anchor for the office park, is a 6-story low-rise building somewhat reminiscent of a traditional stacked vertical office block. It was built in 1966 by Rauenhorst Construction. Nearly devoid of exterior ornamentation, the tower's architectural character is defined by its wide projecting eaves, glass and masonry curtain walls, and flat roof. There is no differentiation in fenestration or exterior finishes between floors except the sixth floor, where the offices have larger windows. The building is oriented with its corners

pointing to the cardinal compass points, though no one elevation is treated as the primary façade. Four single-story rectangular office buildings radiate outward from the tower.

The 2-story office buildings are low-profile, monolithic, box-like structures characterized by their Modernist style horizontal proportions, undecorated masonry walls, and flat roofs without parapets. The walls are dominated by narrow, vertically aligned vertical windows between concrete ribs: the visual effect of the windows and exposed framing is repetitive and monotonous. No elevation is treated as the primary façade and there is no differentiation between floors except at the entrances. Although there are minor differences in size and proportions between the buildings constructed during the Pentagon Tower and Pentagon Quads phases of the development, they all share the same basic design elements and architectural anonymity.

Except for a small plaza at the west end of the complex, landscaping consists entirely of parking lots, which function somewhat like open spaces; at street level, the parking areas are more visually prominent than the office buildings (with the exception of the tower), which serve as backdrops to the rows of parked cars during normal business hours. Highway 100, the original Twin Cities beltway constructed between 1938 and 1942, and its interchange with Interstate Highway 494, completed in 1959, define the physical context of development in southwest Edina and are, in fact, Pentagon Park's reason for existence.

The multi-tenant office park is designed to house up to approximately 300 tenants and incorporate a wide range of space types, including offices, lobbies, conference rooms, rest rooms, mechanical and service areas, restaurants, banks, postal and copy services, vending areas, daycare, and small shops. The office park's primary amenity, the Fred Richards Executive Golf Course, is located outside of the Gateway Study Area boundaries.

### Historical Information

I was unable to verify the accuracy of the statement, which appears on the Wayzata Properties webpage, that Pentagon Park represents "the first planned office park in the Twin Cities." (A recent article in *Minneapolis/St. Paul Business Journal* refers to it as "one of the first corporate campuses in the Twin Cities"; it is not mentioned in Gebhard and Martinson's *Guide to the Architecture of Minnesota* [1977] or Scott and Hess' *History and Architecture of Edina* [1981].) According to the National Building Museum, the General Motors Technical Center at Warren, Michigan, was the first

modern suburban office park in the country. Designed by the Finnish American father-and-son architectural team of Eliel and Eero Saarinen, the 25-building, 330-acre facility was designed in 1949-51 and built in 1955-56. Like the Pentagon Park buildings, the GM Tech Center is a Modernist composition dominated by low-rise "Miesian" style buildings, abundant parking, and landscape amenities. The Minnesota Mining and Manufacturing Company (3M) headquarters on I-94 in Maplewood, designed by Ellerbe Architects and built in the late 1950's, would appear to have a good claim to the title of first *corporate* office park in the Twin Cities and is also an example of Modernist architecture. It may well be that Edina's Pentagon Park represents the first *speculative* office park development in the Twin Cities—more intensive research will be required to clarify this historical association.

According to Hesterman's narrative history of Edina, early non-residential development in this part of the city was somewhat controversial:

Though Chicago planning expert Walter Blucher had argued to the Edina Council in 1955 that Edina needed commercial and industrial development to avoid increasing tax rates, neighborhood opposition slowed commercial development . . . Nevertheless, the concept of carefully planned commercial and industrial development with tight zoning and deed restrictions which Southdale pioneered provided a solution which allowed Edina to incorporate commercial and industrial development which would strengthen rather than undermine Edina's character as a residential community. By 1970 the Pentagon Park and Edina Interchange Centers near the intersection of Highway 100 and 494 had helped diversify Edina's tax base. Even so, development of land use plans for the southwest corner of the village . . . continued to draw fire from area residents (pp. 96-97).

Pentagon Park was designed and built by Rauenhorst Construction, a company founded by 25-year-old Gerald A. Rauenhorst in 1953. It was one of the company's biggest early projects, along with the Normandale Center Industrial Park (1961-70). In 1982 Rauenhorst Construction became Opus Corporation, one of the largest real estate development companies in the country.

### Evaluation of Potential Significance

For a building or group of buildings to qualify for designation as an Edina Heritage Landmark it must meet one of the landmark eligibility criteria by being associated with an important historic context and retaining historic

integrity of those features necessary to convey its significance. Built between 1963 and 1970, the Pentagon Park property certainly meets the minimum requirements for consideration as a heritage resource. The buildings physically and spatially comprise a specific environment shaped by historical processes of land use. Architecturally, the buildings are the product of the dissemination of the Modern or "International" style that dominated commercial architecture from the early 1950's through the late 1970's.

Mere association with a particular period or architectural style is not enough for Pentagon Park to qualify as historically significant: it must be shown to have been significant in commercial or architectural history. Contextually, it relates to the broad theme of postwar suburban development delineated in the City of Edina Historic Context Study (which provides the framework for identifying and evaluating heritage resources within the city limits). Although office park was not specifically identified as a significant heritage property type in the historic context study, the general theme of Modern style commercial architecture is recognized as one aspect of the postwar suburban built environment. Unlike the National Register of Historic Places, which disqualifies buildings less than 50 years old from consideration unless they are of "exceptional" importance, the city's landmark code sets no arbitrary restrictions on how old a property must be before it can be considered a heritage resource. For planning purposes, the City uses 1974 as the terminal date for the historic context dealing with suburban development. The Pentagon Park property falls well within the chronological limits of "The Suburban Landscape" study unit.

While it clearly possesses the defined characteristics required to represent the theme of suburban commercial development, it is unlikely that Pentagon Park represents the sole surviving example of a 1960's office complex in Edina—comparison with other, historically-related properties will be essential for determining its preservation value. It is certainly not the best surviving example of Modern style commercial architecture in the city, though its association with the early career of professional engineer/real estate developer Gerald A. (Gerry) Rauenhorst, the founding chairman of Opus Corporation, may be significant as well.

### Recommendation

With respect to the draft AUAR, the State Historic Preservation Office (SHPO) inventory database for historical and architectural resources is not considered a reliable indicator of the presence or absence of significant cultural resources within a given area. While it is true that the Gateway

Study Area contains no properties that have been listed in or determined eligible for the National Register of Historic Places, the reason for this would appear to be obvious: until the present investigation, no one has even looked for these resources on the ground. Given that the developer's own website refers to the Pentagon Park property as "the first planned office park in the Twin Cities," even declaring that it "has achieved virtual landmark status within the community," one wonders why the AUAR preparers did not undertake even a perfunctory assessment of the project's effects on potential heritage preservation resources.

While it is not possible for me to make a conclusive determination of Pentagon Park's heritage landmark eligibility at this time, I would recommend that the potential heritage value of the buildings be given proper consideration during the development planning process. At a minimum, more intensive survey is needed to provide the information needed to fully evaluate its historical and architectural significance. This will require a close and careful look at the property to identify all heritage resources within the area of project effects, detailed inspection of the individual buildings, and thorough documentation of their physical history. I would also like to do more research on the history of office parks in the Twin Cities area to better determine how Pentagon Park represents the property type and to develop a better perspective on the potential significance of being "the first" example of the type.

Given the rising level of preservation interest in heritage resources from the "recent past," the SHPO could be expected to require intensive survey and mitigation of adverse effects if any future project involving the Pentagon Park locality would require compliance with the National Environmental Protection Act or the National Historic Preservation Act. (Any projects using Community Development Block Grants, State Aid transportation funds, or other federal assistance would be subject to SHPO review and compliance.)

Assuming that all or part of the Pentagon Park office complex will eventually give way to redevelopment, several mitigation options are available to avoid complete loss. Before demolition occurs, the tower and the other office buildings should be permanently recorded with archival-quality drawings, photographs, and written data so that a body of information will remain about them. As a matter of policy, the Heritage Preservation Board has adopted the Secretary of the Interior's standards for historical and architectural documentation, which provide an appropriate format for recordation products. (The same mitigation standards used in National Register of Historic Places program). It may

also be appropriate to salvage some architectural elements for curation in a museum.

### References Cited

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[http://www.wayzataproperties.com/pentagon\\_park.htm](http://www.wayzataproperties.com/pentagon_park.htm)