



Preserving America's Heritage

July 14, 2010

*THB*  
Thomas A. Bradley  
Superintendent, Jefferson National Expansion Memorial  
National Park Service  
11 North Fourth Street  
St. Louis, MO 63102-1882

**Ref: Jefferson National Expansion Memorial "Framing a Masterpiece" Design Competition  
St. Louis, Missouri – D62 (JEFF)**

Dear Mr. Bradley:

Enclosed is your copy of the fully executed Memorandum of Agreement for the referenced project. By carrying out the terms of the Agreement, you will fulfill your responsibilities under Section 106 of the National Historic Preservation Act and the regulations of Advisory Council on Historic Preservation. The original Agreement will remain on file at our office.

We commend the National Park Service for working closely with the Missouri and Illinois State Historic Preservation Officers and a wide range of consulting parties toward ensuring preservation of this important National Historic Landmark.

If we may be of further assistance as the Agreement is implemented, please contact Louise Dunford Brodnitz (202) 606-8527, or via e-mail at [lbrodnitz@achp.gov](mailto:lbrodnitz@achp.gov).

Sincerely,

Caroline D. Hall  
Assistant Director  
Office of Federal Agency Programs  
Federal Property Management Section

Enclosure

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004

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**Memorandum of Agreement  
among the  
National Park Service,  
Jefferson National Expansion Memorial  
the  
Advisory Council on Historic Preservation  
the  
Illinois State Historic Preservation Officer  
the  
Missouri State Historic Preservation Officer  
and  
CityArchRiver2015 Foundation  
for the  
*Framing a Modern Masterpiece* International Design Competition**

**WHEREAS**, the National Park Service (NPS) is responsible for meeting the requirements of Section 106 of the National Historic Preservation Act (NHPA), as amended, and has recommended undertaking an international design competition in the preferred alternative of the October 2009 General Management Plan/Environmental Impact Statement (GMP/EIS) for Jefferson National Expansion Memorial (JNEM); and

**WHEREAS**, the CityArchRiver2015 Foundation (Sponsor) is sponsoring such an undertaking in the form of an international design competition focusing on the Memorial, a National Historic Landmark, to result in the selection of a design "to integrate the park, the east and west sides of the Mississippi River, the surrounding attractions and the downtown into a single and vibrant dynamic destination;" and

**WHEREAS**, the undertaking has the potential to have an adverse effect on historic properties that are National Historic Landmarks (Gateway Arch and Eads Bridge), and are on the National Register of Historic Places (Eads Bridge and the Jefferson National Expansion Memorial Historic District, including the Gateway Arch, Old Courthouse, and Old Cathedral); and

**WHEREAS**, the NPS has determined that the Area of Potential Effect (APE) for the project will include National Historic Landmarks and National Register Historic Properties (see APE map and list attached), and is entering into this agreement with the parties listed above to ensure that future actions have appropriate review and comply with Section 106 of the National Historic Preservation Act (16 U.S.C. 470) and its implementing regulations, "Protection of Historic Properties," (36 CFR Part 800); and

**WHEREAS**, the Advisory Council on Historic Preservation (ACHP) has been afforded the opportunity to comment and has chosen to participate; and

**WHEREAS**, the project may have an effect on properties of significance to American Indian Tribes, therefore the federally recognized Osage Nation and Peoria Tribe of Indians of Oklahoma have been invited to participate; and

**WHEREAS**, the City of St. Louis, Federal Highway Administration, Illinois Department of Transportation, Metro, Metro East Parks & Recreation Department, Missouri Department of Transportation, Missouri Preservation, National Trust for Historic Preservation, Roman Catholic Archdiocese of St. Louis, U.S. Army Corps of Engineers, U.S. Coast Guard, U.S. Environmental Protection Agency, and U.S. Fish and Wildlife Service have been invited to participate as concurring parties; and

**WHEREAS**, the ACHP regulations encourage federal agencies to use to the extent possible existing agency procedures and mechanisms, including mechanisms under the National Environmental Policy Act (NEPA), to fulfill their consultation requirements; and

**WHEREAS**, the NEPA compliance process enables public participation at a very early stage in the planning process for undertakings that may have an adverse effect under the NEPA, and public comment on the Draft GMP/EIS containing the preferred alternative was solicited between January 16, 2009 and March 16, 2009, via a Federal Register notice of intent, a press release, website postings, two public meetings, an informal open house information session, and brownbag sessions at various locations;

**NOW, THEREFORE** the NPS, ACHP, Missouri SHPO, Illinois SHPO, and Sponsor, as full signatory parties, and Missouri Preservation and the National Trust for Historic Preservation, as concurring parties, agree that the *Framing a Modern Masterpiece* International Design Competition shall be administered in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

## **STIPULATIONS**

### **I. Applicability**

This Memorandum of Agreement (MOA) applies to all activities associated with the design competition under the direct or indirect jurisdiction of the NPS. This MOA does not apply to NPS undertakings within the boundaries of JNEM not associated with the design competition. A separate Programmatic Agreement will define the Section 106 process for the implementation of the successful design.

### **II. Initiate Section 106 during Stage I of the competition process**

A. The NPS, Missouri and Illinois SHPOs, and the ACHP participate in January 25, 2010 meetings organized by Donald Stastny, the Design Competition Manager, to discuss Section 106 and NEPA compliance.

B. JNEM sends letters to the ACHP, SHPOs, and federally recognized Tribal Governments initiating Section 106 and recommending an Area of Potential Effect.

C. The NPS contributes language on the federal government's responsibilities for Section 106 of the NHPA and NEPA compliance in the Design Competition Manager's memorandum to the nine design teams selected to compete in Stage II of the competition process.

III. Identification of historic properties in the APE, informing the design competitors of the historic properties in the APE, the preservation mission of the NPS, and JNEM's Section 106 responsibilities and consultation during Stage II of the competition process.

A. On February 18, 2010, Don Stevens, Chief History and National Register Program, Midwest Region, National Park Service, presents an overview of the NPS preservation mission and responsibilities under Sections 106 and 110 of the NHPA and NEPA as it pertains to the competition at the Networking Session for the nine design teams and prospective team members. The NPS provides a copy of the power point presentation to the signatories and consulting parties.

B. On March 9, 2010, the Technical Advisory Group, composed of representatives of the signatories and organizations invited to participate as concurring parties, is formed and meets to discuss the regulatory process, issues, and concerns regarding the competition.

C. On March 30, 2010, the Technical Advisory Group meets for further discussion of the regulatory process, issues, and concerns regarding the competition. These will be presented to the designers on April 28, 2010.

D. On March 31, 2010, before team interviews and evaluations begin, the NPS, SHPOs, and ACHP brief the jury regarding Section 106 compliance.

E. Prior to April 7, 2010, the NPS, SHPOs, and ACHP consult and agree upon information regarding Section 106 compliance and provide it to the Sponsor for inclusion in the Stage III result notification letters sent to teams by the Competition Manager.

IV. Assessment of Effect during Stage III of the competition process.

A. On April 28, 2010, the NPS leads a Section 106 workshop as part of the Design Competition Briefing with the help of the SHPOs and the ACHP to present information on the 106 process, the historic resources in the project area,

and the application of the Secretary of the Interior Standards on the Treatment of Historic Properties with Guidance on Rehabilitation.

B. On April 28, 2010, the Technical Advisory Group briefs designers regarding compliance issues and regulations.

C. On April 28, 2010, the Sponsor hosts a "Meet Your Designers Night" public event at which teams present previous work and members of the public are invited to submit written comments and input regarding the competition. The NPS compiles a summary of the public comments and distributes the summary to the SHPOs, ACHP, Tribal Governments, and consulting parties.

D. From May 24-28, 2010, during the mid-course review for teams, the technical advisory group provides comments regarding Section 106 compliance, effects on historic properties, appropriate alternatives to comply with Department of the Interior (DOI) standards, and possible mitigation for adverse effects to teams.

E. From June 26-28, 2010, during the second round of mid-course reviews, the technical advisory group meets again with each team to provide Section 106 advice regarding effects, alternatives, and mitigation.

F. During the week of August 16, 2010, the designs submitted are on public display at the park, and consulting parties and the public are invited to attend and observe team presentations to the jury and are given an opportunity to submit comments in written form. The NPS and the Sponsor compile the comments and provide them to the jury, SHPOs, and ACHP.

G. Prior to the final selection by the jury, the NPS, SHPOs, and ACHP analyze final submittals, consult with each other, and provide a report to the jury summarizing Section 106 issues and concerns and making recommendations relative to effects on historic properties. Copies of the report are provided to consulting parties.

H. After the final selection, a NEPA/Section 106 review with public comment will take place with an assessment of effect and impacts on historic properties and other environmental resources. The NPS, SHPOs, ACHP and Tribal Governments will complete Section 106 consultation on the design competition and will begin the preparation of a programmatic agreement on the implementation of the final design.

#### V. Dispute Resolution

Any party to this agreement may terminate it by providing thirty (30) days written notice to each of the other parties, provided that the parties will consult during the period prior to termination to reach agreement on amendments and other actions

that would avoid termination. In the event of termination, the NPS will comply with 36 CFR 800.13 with regard to the undertaking.

**VI. Execution and Implementation**

Execution and implementation of this MOA evidences that the NPS has satisfied its Section 106 responsibilities for all undertakings covered by this MOA.

Execution and implementation of this MOA also evidences that the NPS has afforded the ACHP a reasonable opportunity to comment on the undertakings and their effects on historic properties, and that the NPS has taken into account the effects of the undertakings on historic properties.

**VII. Duration**

This MOA shall become effective upon execution, and shall remain in effect until the conclusion of the design competition on September 24, 2010.

### **Area of Potential Effects**

As illustrated in Figure 3.4, the Area of Potential Effects (APE) includes areas that are bounded by Broadway south of Market to Interstate 64, east on I-64 to Interstate 55, south on I-55 and Third Street to Chouteau Avenue, north along the west side of the river to the Poplar Street Bridge, east across the bridge following I-55/64 to the rail lines that run to the northeast crossing Trendley Avenue and continuing to the rail line that curves to the west and passes north of the Cargill grain elevator to Front Street, turning north on Front Street to Eads Bridge, west across Eads Bridge to the riverfront, north along the river to Martin Luther King Memorial Bridge, west along the bridge and its associated access drive to Convention Plaza, west on Convention Plaza to North Broadway, south on Broadway to Chestnut, west on Chestnut to Seventh, south on Seventh to Market, and east on Market to Broadway.

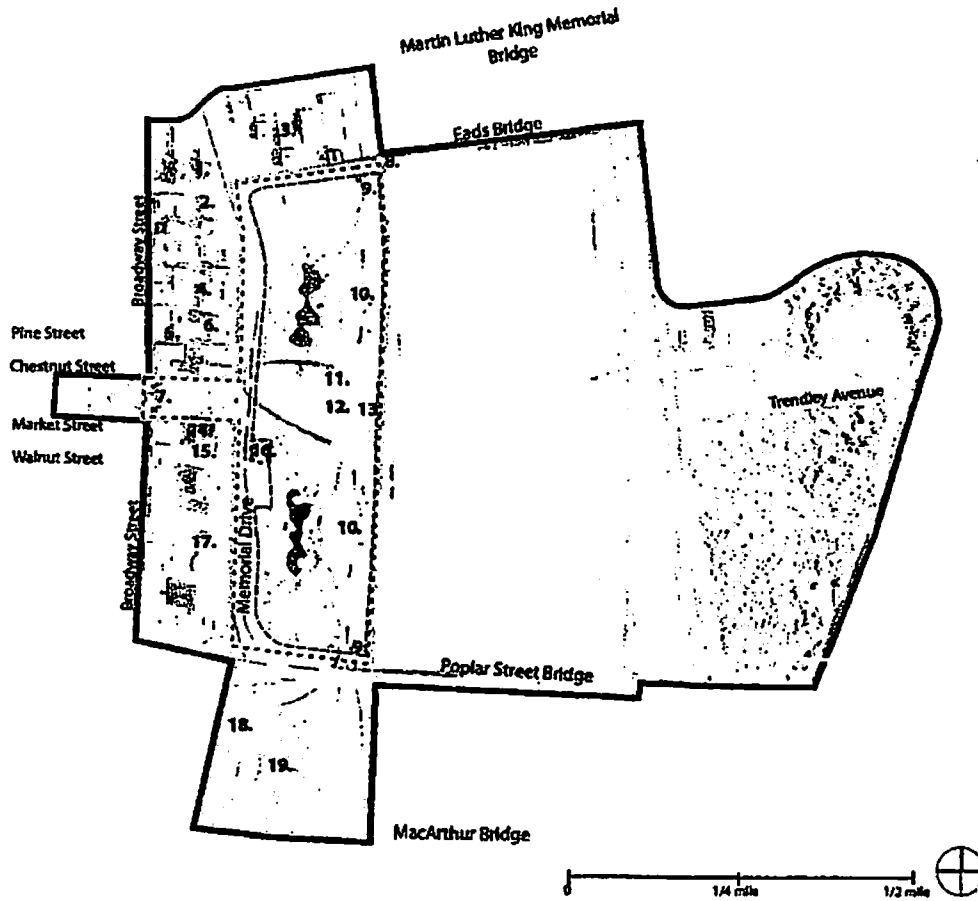
There are thirteen buildings, structures, and districts located outside of the bounds of the Memorial but within the APE that are listed in the National Register of Historic Places and/or the City of St. Louis Landmarks registry. The locations of these resources are identified in Figure 3.4. These resources include Eads Bridge, located directly north of the Memorial; the Laclede's Landing Historic District further to the north; the J. Kennard and Sons Carpet Company Building, the Missouri Athletic Club Association Building, the Security Building, the Laclede Building, the Mississippi Valley Trust Company Building, the International Fur Exchange, and Pet Plaza, all located west of the Memorial; and St. Mary of Victories Church and the Crunden-Martin Manufacturing Company District, located south of the Memorial.

Figure 3-4. Historic Buildings, Structures, Sites, Objects, and Districts Located within the Area of Potential Effects.

LEGEND

- ..... Park Boundary
- NHL Boundary
- Area of Potential Effects
- ..... Archeological Area of Potential Effects

1. Missouri Athletic Club Association Building
2. J. Kennard and Sons Carpet Company Building
3. Laclede's Landing Historic District
4. Security Building
5. Mississippi Valley Trust Company Building
6. Laclede Building
7. Old Courthouse and sundial
8. Eads Bridge
9. North and South Overlooks
10. Railroad tunnel cuts
11. Gateway Arch
12. Museum of Westward Expansion
13. Grand Staircase
14. International Fur Exchange
15. American Zinc, Lead and Smelting Company Building
16. Old Cathedral
17. Pet Plaza
18. St. Mary of Victories Church
19. Crunden-Martin Manufacturing Company Historic District





## Appendix C: Detailed Descriptions of Historic Resources within the APE

### The Old Cathedral

The parcel occupied by the Old Cathedral was designated for religious purposes when the city was founded in the mid-18th century by Pierre Laclede and Auguste Chouteau. A log house and small church were built on the site in the late 18th century. In 1826, St. Louis became a Catholic diocese, and several years later construction began on the current church. Completed in 1834, the Greek Revival Style structure was the first cathedral established west of the Mississippi. In 1961, Pope John XXIII named the building the "Basilica of St. Louis, King of France," the highest honor bestowed upon an American Catholic church.



The Old Cathedral as viewed from the south.

### Eads Bridge

Eads Bridge, a National Historic Landmark, borders the Memorial to the north, connecting St. Louis, Missouri, and East St. Louis, Illinois, across the Mississippi River. Constructed between 1867 and 1874 to accommodate rail, pedestrian, and vehicular traffic, the bridge employs a three-span deck arch design, with ribbed steel arches and decks supported on granite-faced limestone piers. There are small masonry arches on the approaches to the bridge, and larger arches next to the river. At the time it was constructed, the spans were larger than any previously constructed bridge. It is significant for its pioneering design, method of construction, and materials. The bridge was listed in the National Register in 1985, with a period of significance spanning from 1867 through 1874 (NPS 1985).



Eads Bridge looking east across the Mississippi River.

### Laclede's Landing Historic District

The Laclede's Landing Historic District is a nine-block area north of the Memorial. It is bordered by the Mississippi River to the east, Eads Bridge to the south, Third Street to the west, and the Dr. Martin Luther King Memorial Bridge to the north. The district is significant as the only surviving portion of the City's 19th-century commercial waterfront. It preserves a large number of structural cast iron commercial front buildings, as well as the City's original 18th-century street grid and sloping topography. Laclede's Landing was listed in the National Register in 1976. The Christian Peper Building at 719 North First Street is a City Landmark.



Laclede's Landing north of the Monument.

#### J. Kennard and Sons Carpet Company Building

The J. Kennard and Sons Carpet Company Building is located at 400 Washington Avenue, near the northwest corner of the Memorial. Designed by Isaac Taylor and constructed in 1901, this commercial building is significant as an example of Italian Renaissance Revival architecture in the city. The seven-story building is characterized by highly decorative terracotta panels, scrolled keystones and brackets, quoined windows, and a scalloped cornice. It was listed in the National Register in 2000.

#### Missouri Athletic Club Association Building

The Missouri Athletic Club Association Building is located northwest of the Memorial at 409 Washington Avenue. It was designed in the Renaissance Revival Style in 1915 by St. Louis architect William B. Ittner, and served as the first businessmen's amateur athletic club in the city. It continues to house the club today. The building was listed in the National Register in 2007.

#### Security Building

The Security Building is sited west of the Memorial, at 319 North 4th Street. Architects Peabody, Stearns and Foster designed the building in the Classical Revival style between 1890 and 1892. Its significance lies in its design; it was one of a series of early tall office buildings in St. Louis, and at the time was the most costly such building in the city (NPS 2000). Eleven stories tall, the Security Building is characterized by a three-story pink granite base, a four-story arcade through the center of the building, and a second two-story arcade capped by a classically inspired cornice. The structure was listed in the National Register in 2000.

#### Laclede Building

Located at 408 Olive Street, west of the Memorial, the Laclede Building is the city's earliest surviving example of the skyscraper, dating from 1886-1888. Eight stories high, the pioneering design employed cast iron framing and fireproofing, and was finished in a restrained commercial style. In 1906, the

building was renovated and Classical details were added to both the interior and the exterior of the structure. The Laclede Building was listed in the National Register in 1998.

#### Mississippi Valley Trust Company Building

The Mississippi Valley Trust Company Building is located at 401 Pine Street. The Classical Revival style building was constructed in 1896 to house the Mississippi Valley Trust Company, one of the city's preeminent financial institutions. The building is locally significant not only because of this association, but also for its design. It was listed in the National Register in 2001.

#### American Zinc, Lead and Smelting Company Building

Located at 120 South 4th Street, just south of the Old Courthouse, the American Zinc, Lead and Smelting Company Building was designed by the architectural firm of Hellmuth, Obata, and Kassabaum (HOK) in 1967. Although less than 50 years old, the building is viewed as a fine local example of Modern architectural design and techniques. The structure employed the Vierendeel truss, allowing for highly flexible interior spaces. The interior structural system is reflected on the exterior in the ladder-like windows on the sides of the building (NPS 1998c). The American, Lead and Smelting Company Building was listed in the National Register in 1998.

#### International Fur Exchange Building

The International Fur Exchange Building, located at 2-14 South 4th Street, is directly southeast of the Old Courthouse. The period of significance runs from 1920, when the building was constructed, through 1948. The building has national importance due to its association with the primacy of the city in the international fur trade. The commercial structure is seven stories high and is clad in multi-colored brick with white terracotta accents. It was listed in the National Register in 1998.

### **Pet Plaza**

Pet Plaza is located at 400 South 4th Street, overlooking the Gateway Arch grounds. Constructed in 1969 as the world headquarters for Pet, Inc., this thirteen-story concrete tower was designed in the New Brutalist style to present a fresh image for an established company. The building is distinguished by its textured concrete, stark lines, and elevated plaza (NPS 2004a). It was listed in the National Register in 2004.

### **St. Mary of Victories Church**

St. Mary of Victories Church is a City of St. Louis Landmark. Located south of the Monument, within Chouteau's Landing, the building was constructed in 1843-1844 with an addition in 1859-1860. It was the first German national parish in the city and the second completed Catholic Church, after the Old Cathedral. Together with the adjacent parish school, erected in 1882, St. Mary of Victories Church was listed in the National Register in 1980.

### **Crunden-Martin Manufacturing Company Historic District**

The Crunden-Martin Manufacturing Company District encompasses seven buildings south of the Memorial, within Chouteau's Landing. The industrial riverfront buildings, dating between 1904 and 1920, are five to six stories high and reflect turn-of-the-century Revival styles. The district is significant both for its architectural styles and for its association with the Crunden-Martin Manufacturing Company, one of the more important wood-ware, willowware and metal goods firms in the city. The district was listed in the National Register in 2004 with a period of significance of 1904 through 1954.

Memorandum of Agreement  
*Framing a Modern Masterpiece International Design Competition*

NATIONAL PARK SERVICE


By: Tom Bradley

Date: 4/20/12

Thomas A. Bradley  
Superintendent, Jefferson National Expansion Memorial

Memorandum of Agreement  
*Framing a Modern Masterpiece* International Design Competition


MISSOURI STATE HISTORIC PRESERVATION OFFICER

By:  Date: 5/20/10

Mark Templeton  
Director, Department of Natural Resources and State Historic Preservation  
Officer

Memorandum of Agreement  
*Framing a Modern Masterpiece International Design Competition*

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: 

Date: 5-13-10

Jan Grimes  
State Historic Preservation Officer



Memorandum of Agreement  
*Framing a Modern Masterpiece* International Design Competition

CITY ARCHRIVER 2015 FOUNDATION

By:  \_\_\_\_\_

Walter L. Metcalfe, Jr.

Date: 4/21/10

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 7/13/10

John M. Fowler  
Executive Director

Memorandum of Agreement  
*Framing a Modern Masterpiece* International Design Competition

Concur: \_\_\_\_\_

MISSOURI PRESERVATION

By *Barbara L. Fitzgerald*

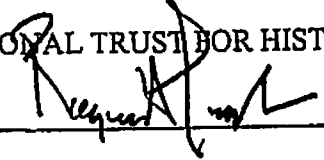
Date: 5-1-10

Barbara L. Fitzgerald  
Executive Director

Memorandum of Agreement  
*Framing a Modern Masterpiece* International Design Competition

Concur:

NATIONAL TRUST FOR HISTORIC PRESERVATION

By:  Date: 5.3.10

Royce A. Yeater, AIA  
Midwest Director, Midwest Office

Memorandum of Agreement  
*Framing a Modern Masterpiece* International Design Competition

Concur:

OSAGE NATION

By: 

James Gray  
Principal Chief

Date: 6-1-2010