

The DNR's Neglect of the Historic Manfred House

Save the Manfred House, Inc. (SMH) was founded in September 2019 out of concern that the historically significant Manfred House, built for noted Minnesota author Frederick Manfred, was being neglected by the Minnesota Department of Natural Resources (DNR). It is located within Blue Mounds State Park in Rock County.

Each of the points summarized below is expanded upon in the following pages.

We call on the DNR to reexamine its intent to tear down the Manfred House, to engage experts and the public more fully, and to conduct a more objective review of the situation than has occurred to date. Only after that is done should the possibility of the demolition of the Manfred House be considered.

Save the Manfred House, Inc.
May 11, 2023

This position paper demonstrates that:

1. The DNR has not lived up to its obligations to steward the Manfred House on behalf of the people of Minnesota.
2. The DNR has not properly considered public opinion in formulating its plans to tear down the Manfred House, and has consistently misrepresented the extent of its public outreach.
3. The DNR issued a Request for Proposal that was designed to result in the DNR's desired outcome of the demolition of the Manfred House, rather than considering all reasonable options.
4. The DNR has not engaged with the proper experts to consider the range of possible options for the Manfred House.
5. The DNR did not support the listing of the Manfred House on the National Register of Historic Places, a designation the house received for its cultural significance and unique design.
6. The DNR has not been responsive to requests from SMH for information that is in the public interest.

1. The DNR has not lived up to its obligations to steward the Manfred House on behalf of the people of Minnesota.

Over a period of decades the DNR has neglected upkeep on the Manfred House. Seen by the DNR as subordinate to other assets at Blue Mounds State Park, the maintenance of the house has lagged. Other problems at the Park that needed attention emerged over the last decade, but the neglect of the Manfred House had started to occur well before then.

The Manfred House has been closed to the public since 2016, leading to further deterioration. The DNR now says the house is beyond restoration, yet it is the DNR's policies and foot-dragging have led to the current condition of the house. The actions by the DNR have been a form of "demolition by neglect," a strategy used by owners of historic properties to let them decline and then argue that they are too far gone to save.

The years of neglect and the current push to demolish the house show that the DNR has failed in its stewardship responsibilities regarding this important property.

2. The DNR has not properly considered public opinion in formulating its plans to tear down the Manfred House, and has consistently misrepresented the extent of its public outreach.

The DNR has repeatedly informed SMH, the media, and other interested parties that the process to review the future of the Manfred House has been rigorous and transparent to the public.

The DNR's claims are based upon the work of a five-member Blue Mounds State Park Citizen Advisory Group which had four meetings in 2017. The group was tasked with providing input on a wide range of issues facing the Park at the time, most notably a lack of potable water for visitors and the restoration of Mound Creek after a dam failure. The Citizen Advisory Group (CAG) was not specifically charged with arriving at recommendations for the Manfred House and it is clear that the house was not the focus of attention.

According to the minutes of the CAG, "Fix interpretive center" (the Manfred House) was among five priority topics identified by the members of the group during the first meeting. However, there was no serious examination of that possibility during its deliberations at that meeting.

The Park staff who attended the meeting were asked to compile a list of their priorities for the CAG to review at its second meeting. Twelve items were brought forth on that list, but the Manfred House was not even included.

During the second meeting, the staff members gave their opinions about the condition of the Manfred House. Someone (not further identified) "suggested maybe taking the

structure down and leaving the foundation as a ‘ruin’ or historical interpretation opportunity.” (This idea would resurface in later DNR plans.)

According to the minutes, “The discussion concluded with the need to follow-up on the pros/cons of these issues, to communicate with the Manfred family, and to engage the broader community about this question of what to do with the building.” One of the “next steps” coming out of the meeting was “DNR to look at Manfred house purchase agreement related to acquisition of property and possible issues with potential future disposition.”

The restoration of Mound Creek and the recreation opportunities within the Park were the focus of the third meeting. There was mention of “maintaining interpretive opportunities in the area near the Manfred house.” At the end of the minutes was a section of “Focus areas to build on.” One of the items was “Manfred house: Get more community input on ideas, and come up with some options that focus on history and interpretation. This topic is significant enough to need its own attention.”

Despite that, the Manfred House was not discussed at the fourth and final meeting. But one of the next steps listed in the wrap-up was: “DNR will convene a broader community engagement effort specifically around the Manfred house this summer; will share information with group, local media, radio, on website, etc.”

That “broader community engagement effort” did not happen.

The volunteers who made up the Citizen Advisory Group did important work on behalf of the DNR and Blue Mounds State Park, and several of the CAG’s recommendations have been implemented. But they did not spend much time on the Manfred House, contrary to the DNR’s assertions of a robust process.

Some notes in the minutes of the four meetings are illustrative of the general process involved, and describe members’ reactions to the meetings:

Some members feel like there was little opportunity to influence decisions, that plans were already underway.

A comment was made about how the group feels like they are a mouthpiece for DNR information.

Several of the meetings were informational, but made it seem like there was no opportunity for input; this was confusing and frustrating to some; felt “helpless.”

Some people wished more community members would have been involved.

The limited attention paid to the Manfred House by the Citizen Advisory Group – and how the DNR steered the discussions about it – stand in contrast to repeated characterizations made by the DNR in media accounts about the depth of its process

and the degree to which the public was involved.

For example, in a 2021 opinion piece published in the *Rock County Star-Herald* a representative of the DNR wrote, “It is also important to point out that during the 2017 Blue Mounds State Park Citizen Advisory Group process, group members learned about the state of the building and generally agreed the site needs to be repurposed for a different use in the future.”

But that statement is not supported by the minutes of the meetings of the group.

An email to a member of the Minnesota House of Representatives from the DNR put it this way:

The DNR has undertaken a lengthy stakeholder engagement process, including a series of group meetings in the community to discuss a variety of issues pertaining to the park, including the Manfred House. Among various outcomes, the citizen advisory group requested that they be engaged in considering alternative options, which is culminating in the current opportunity for public comment on the design concepts.

That statement gives the wrong impression. There was not a “lengthy stakeholder engagement process” and the group that met involved only a handful of people who had to deal with a wide range of issues and spent a relatively small portion of their time discussing the Manfred House. Similar statements from the DNR can be found in press accounts related to its plans for the Manfred House.

An online public survey was eventually conducted in the spring of 2021. However, the DNR did not seek input on whether the Manfred House should be torn down or restored, but rather asked for opinions about which of three landscape design proposals should be implemented after it was razed.

The DNR did not promote the survey widely. It gave only minimal public notice, apparently not even posting a link on its social media accounts as it has in other cases. The limited efforts to make citizens aware of the survey were focused on Rock County, which is the location of Blue Mounds State Park, despite the Park’s popularity well beyond that area and the DNR’s responsibility to manage the park on behalf of all the people of Minnesota.

(It is also worth noting that given its location and unique assets, Blue Mounds State Park attracts a large number of visitors from other states. Frederick Manfred coined the term “Siouxland” to describe the region that include parts of Minnesota, Iowa, South Dakota, and Nebraska, and visitors come from across that area.)

The public survey contained a number of multiple-choice questions, but many of the other questions provided the opportunity for comment. The results were not made public by the DNR but were shared with SMH.

If public opinion regarding the future of the Manfred House is of importance to the DNR, then what the DNR saw in those comments should have been a wakeup call. The public reaction was overwhelmingly against the three plans proposed by the DNR. The commentary was clear: The DNR should not implement its plans to tear down the Manfred House, and should look at all possible alternatives that could save the house.

Here is one of the DNR questions and the percentage of each answer:

In your view, which of these concepts represents the appropriate facilities for Eagle Rock Vista and the best value for the use of public dollars?

Design Concept #1	22	4%
Design Concept #2	15	3%
Design Concept #3	59	11%
None of the above	424	78%
Did not answer	22	4%
Total	542	

These results show the overwhelming rejection of the DNR’s proposals. The DNR’s conclusion, however, is to propose a different design that still includes tearing down the Manfred House. Any objective view of the overall survey data and commentary would not support that decision. The responses clearly do not favor the destruction of that historic property; respondents begged for alternative solutions.

In 2022, following the listing of the Manfred House on the National Register of Historic Places, a DNR spokesman ignored the message conveyed by the results of the public survey and instead turned to the remarks of a select few commenters:

Specifically, the consultant has been asked to propose an alternative that incorporates Mr. Manfred’s writing room. Feedback from the public has included comments that the DNR “should at least save the writing room.” The DNR will be reviewing the consultant’s revised concept design and will share it with the public when ready.

There has been no further engagement of the public by the DNR regarding the Manfred House since the survey in early 2021. The results of that survey should be released to legislators and the public so that they can see the rejection of the DNR’s plan to tear down the house.

3. The DNR issued a Request for Proposal that was designed to result in the DNR’s desired outcome of the demolition of the Manfred House, rather than considering all reasonable options.

In 2019, the DNR released a request for proposal (RFP) for “Blue Mounds State Park Manfred House – Eagle Rock Vista Trailhead.” Instead of exploring the possibilities to restore the Manfred House, the DNR planned for its demise. Some excerpts from the introductory page:

The Frederick Manfred House is in extensive disrepair such that the structure is no longer sustainable. The Manfred house was formerly a park visitor center and interpretive facility, but is now closed and poses significant management challenges caused by the environmental conditions onto which the building was constructed. Specifically, the DNR considers the building unsafe and unsustainable due to persistent water intrusion, environmental hazards, and related disrepair. However, as an American author who has been identified with a residence of unique architectural character, there is a desire to maintain a physical and/or interpretive element about Manfred and this site, as well as to provide park users with a suitable, upgraded trailhead experience.

The DNR would like to consider various alternatives for enhancing the natural landscape and space for public use, education, and appreciation, while acknowledging Frederick Manfred’s legacy with an appropriate structure and/or site/landscaping design that provides park visitors with a gathering, staging and launching point for entry into the southern part of the Blue Mounds State Park trail system.

(Although none of the designs ultimately proposed by the DNR for public comment would include the writing room referenced earlier, the idea was broached in the RFP: “Consideration should be given for somehow maintaining this type of experience or similar as part of one or two of the design options.” Thus, the DNR’s “new idea” in response to the 2021 survey was simply going back to a previous plan rather than listening to the input of the public.)

TKDA was chosen to conduct an Existing Conditions Assessment regarding the Manfred House. It filed its report in April 2020. The term “conditions assessment” was misleading, because TKDA wasn’t even allowed inside the house.

As noted by TKDA in the cover letter for the report:

TKDA staff were not allowed entry into the Visitor Center due to unsafe conditions under the direction of the Minnesota Department of Natural Resources (DNR) staff. Our survey relies on exterior visual assessment, building plans, and photos provided by DNR staff. We also address mechanical and electrical issues based on the few observations noted.

That’s not a good starting point for analysis. It does not fit with the approach that would be taken by a qualified historic preservation architect in examining a building to be considered for restoration.

The cover letter was signed by the “Project Manager,” who is further identified as a “Senior Registered Landscape Architect.” That is another indication that the project was intended by the DNR to be one focused on creating a new landscape, rather than assessing the possibility of saving an historic structure.

While some of the observations of TKDA are important to consider, its lack of access and reliance on DNR input rather than inspection means that its assessments and conclusions must be questioned and need further examination.

TKDA’s report matched the wishes of the DNR regarding the Manfred House, and its unsubstantiated and very high cost estimates of a potential restoration seemed to further the existing narrative while not resting on proper inspection by qualified experts.

A subsequent “Structural Condition Assessment” was prepared for the DNR by Braun Intertec in July 2021. (Despite contacts from SMH by that time, the DNR did not inform SMH of the existence of an RFP for this work, nor that the work would take place. SMH learned of it by chance.)

The stated purpose of the work was to determine the suitability for short-term entry to the building by DNR staff and for long-term occupancy. One area of the building was determined to be in poor condition, requiring modifications for access, while the rest of the building was considered to be in fair condition. There were also concerns about air quality.

Braun Intertec stated that the building “can be made suitable for short-term entry with some modifications completed,” but that “the conditions observed are to the point the long-term permanent occupancy should not be considered without considerable rehabilitation completed.” It also wrote that it thought the rehabilitation “would be cost prohibitive.” No details supporting that conclusion (which matches the DNR’s objective) were provided.

As with the report from TKDA, the findings of Braun Intertec provide some information, but Braun Intertec is an engineering/environmental firm. An historical architect was not consulted.

4. The DNR has not engaged with the proper experts to consider the range of possible options for the Manfred House.

The DNR has established a pattern of not consulting experts who could help it make an informed decision regarding the Manfred House. To the best of SMH’s knowledge, the DNR *has not* consulted with:

- a. Architects with specific experience in the renovation of historic buildings (and buildings with issues similar to those faced by the Manfred House).

- b. Experts who could help to consider the literary and cultural importance of Frederick Manfred and events that took place at the Manfred House.
- c. Architectural specialists who could address the unique design of the Manfred House within the history of American architecture, especially in regards to its relationship with the prairie environment.
- d. Foundations and other organizations dedicated to historic preservation who may be able to directly or indirectly provide funds to help with a potential restoration.
- e. Experts in the varied uses of historic buildings or entrepreneurs who may be willing to partner with the DNR to use the building in ways that help fund its ongoing upkeep while being in concert with the overall goals of the Park.

Any serious consideration of the demolition of the Manfred House would explore all of these angles before a final decision is made. That the DNR has not done so demonstrates the weakness of its process.

5. The DNR did not support the listing of the Manfred House on the National Register of Historic Places, a designation the house received for its cultural significance and unique design.

In early 2022, SMH engaged the services of a historical consultant to research the property and prepare a National Register of Historic Places Nomination for the Manfred House.

In a letter to the Minnesota State Historic Preservation Review Board, the DNR reiterated its intention to demolish the house. It ended in this way:

In summary, the DNR is pursuing a sustainable path to retain meaningful elements of the site including consideration of the Writer's room, reclaiming the natural area and creating a modest recreational area. This approach will allow us to honor the historical meaning of the site, preserve the critical natural resources, and honor Mr. Manfred's deep connection to the land while balancing cultural, natural resources, and recreational opportunities at this important site. We appreciate the opportunity to provide this context and hope it is helpful as you consider the National Register nomination.

The State Historic Preservation Office had indicated that the Manfred House was eligible for listing in the National Register under two different categories, based upon its cultural significance and its unique design. The nomination was unanimously approved by the members of the State Historic Preservation Review Board in attendance at its April 2022 meeting.

After federal review of the nomination, the Manfred House was listed on the National Register of Historic Places in June 2022.

6. The DNR has not been responsive to requests from SMH for information that is in the public interest.

Since its founding, SMH has sought to engage with the DNR, encouraging the DNR to revisit its decision process regarding the Manfred House, including seeking out qualified experts to assess the structure objectively rather than in response to the DNR's preference for its destruction.

In addition, SMH has offered to help in whatever way it could, including raising funds to support the re-assessment, and, if appropriate, restoration of the Manfred House. With a long list of projects to address and limited funds to use, it should be an easy choice to at least explore the possibilities, but the DNR has refused to discuss them.

There were some early interactions between the DNR and SMH, including a Zoom meeting and an in-person meeting, both during the fall of 2021, but the DNR has not responded to SMH since November of that year.

Two requests that were included in a letter from SMH to the DNR at that time (and repeated in a subsequent letter in June 2022, following the listing of the Manfred House on the National Register Historic Places) remain outstanding.

a. First, as mentioned before, the DNR has not engaged a historic preservation architect to inspect the building. The letter from SMH stressed that the work of such an expert is critical "to accurately determine the cost of restoring the house and developing a strategy for the future maintenance of the property." Its importance is such that SMH offered to pay for the examination. The DNR has not responded.

b. Second, the DNR also has not shared with SMH very important details about the transference of the property to the DNR in the 1970s, which involved multiple parties. From the June 2022 letter from SMH to the DNR: "Specifically, there should be clarity regarding the roles of the DNR, the Bush Foundation, and the State Park Foundation in funding the purchase, as well as the terms and conditions of the sale." Given the potential importance of that information in the decision making about the Manfred House, not revealing it in advance of the destruction of the house would be a breach of the public trust.

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