

April 17, 2024

David Bennett
Public Works Director/City Engineer
City of Northfield
801 Washington Street
Northfield, MN 55057

RE: Bridge Square-Riverside Park Improvement Project – Phase 1
Archaeological
Northfield, Dakota and Rice Counties
SHPO Number: 2022-1266

Dear David Bennet:

Thank you for continuing consultation on the above referenced project. Information received on February 8, 2024, has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and the Minnesota Field Archaeology Act (Minn. Stat. 138.40).

The City of Northfield is proposing improvements to Bridge Square and Riverside Park, which are contributing resources within the **Northfield Commercial Historic District**, which is listed in the National Register of Historic Places (NRHP). Accordingly, in order for our office to determine that the project will not adversely affect the historic property, the proposed work must be designed in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes* (SOI Standards).

Phase I of the Bridge Square-Riverside Park Improvement Project, which is the focus of this review, includes The Plaza, The Green, and The Terrace. We last provided comments on this project in a letter dated January 24, 2024. In that letter we agreed that the project as presented in the 60% construction documents had been designed in accordance with the SOI Standards and that we looked forward to reviewing the 90% construction documents when they become available.

We have now received and reviewed the following documentation that was included with your February 8th submission:

- City of Northfield Cover Letter (dated 2/8/2024)
- Report *Phase 1 Archaeological Investigation for the Bridge Square-Riverside Park Renovation Project, Northfield, Rice County, Minnesota* (106 Group, October 2023)

Our comments are provided below.

Based on our review of the report, *Phase I Archaeological Investigation for the Bridge Square – Riverside Park Renovation Project, Northfield, Rice County, Minnesota* (106 Group, October 2023), we conclude that archaeological site **21RC0076** is **contributing** to the National Register-listed **Northfield Commercial Historic District (RC-NFC-00263)** under Criterion A as representing archaeological features associated with the early period of significance of the district and under Criterion D for the site's potential to provide more information about the industrial development, community planning, and of the people who used these spaces during the district's period of significance. The site may also be **individually eligible**; however, this has not been fully evaluated.

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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We understand that the proposed project has been designed to minimize adverse effects to the archaeological feature interpreted as the historic surface of Mill Square by limiting excavation to the top 46 centimeters (1.5 feet) of soil and also have an archaeological monitor present during construction. We agree that archaeological monitoring during construction is appropriate considering the depth at which these features have been identified and the overlying impermeable paved surfaces. We look forward to reviewing the Monitoring and Discovery Plan that will be used to guide this work.

The report states that the grist mill portion of the archaeological site is disturbed and does not appear to retain integrity, however, it appears that a portion of the grist mill is intact along the edge of the Cannon River. Lacking an assessment of whether the proposed project will have an adverse effect on this significant archaeological site, we conclude that the project will have **an adverse effect** on the site. While archaeological monitoring during construction may minimize the adverse effect, we recommend that a suitable course of action plan be developed to formalize how the City will mitigate for the adverse effect to the site. In addition to archaeological monitoring during construction, possible mitigation measures could include:

- Preparation of a technical journal article detailing the archaeological site evaluation, including a detailed artifact analysis
- Preparation of a popular press article and/or website content describing the archaeological site and/or historical information learned from the site
- Preparation of an exhibit at the Northfield Historical Society describing the archaeological site, including a detailed artifact description/analysis

We understand that the City has been consulting with various constituent groups, including the Northfield Heritage Preservation Commission. We understand that there has also been extensive community engagement. It will be important to continue to engage stakeholders and the public, with appropriate considerations regarding this project and its potential to effect historic properties, including archaeological site 21RC0076. The City's consultant can provide guidance on how to best document, for both stakeholders and the public, the identified historic archaeological resources and how these resources, along with the above-ground historic properties, warrant consideration as the design process moves forward.

We look forward to further consultation on this project and to coming to an agreement with the City on a suitable course of action to resolve the adverse effect on site 21RC0076. If you have any questions regarding our review of this project, or would like to set up a meeting to discuss our comments and next steps, please feel free to contact me at 651-201-3285 or kelly.graggjohnson@state.mn.us.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Program Specialist

cc: Mathias Hughey, City Planner, Northfield Heritage Preservation Commission