

July 14, 2023

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

RE: Bridge Square-Riverside Park Improvement Project – Phase I
Northfield, Rice County
SHPO Number: 2022-1266

Dear David Bennet:

Thank you for continuing consultation on the above referenced project. This project is being 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 have reviewed the following documentation that was submitted to our office on May 12, 2023, and June 20, 2023:

- 106 Group Letter: *Design Review for Bridge Square-Riverside Park Improvement Project – Phase I, Northfield, Dakota and Rice Counties, SHPO Number: 2022-1266* (May 12, 2023)
- *Northfield Bridge Square Design Updates* (Damon Farber, May 12, 2023)
- Current Photos of Bridge Square and Riverside Park
- Report: *Phase I Archaeological Investigation for the Bridge Square - Riverside Park Renovation Project, Northfield, Rice County, Minnesota* (106 Group, June 2023)

Our comments are provided below.

Design Review

We have reviewed the May 12, 2023, Design Review letter from 106 Group, the document titled *Northfield Bridge Square Design Updates* (May 12, 2023) as prepared by Damon Farber, and the current photographs that were submitted for this project. It is our opinion that the design, as currently proposed, is not fully consistent with the Secretary of the Interior's Standards for Rehabilitation, with associated guidelines for the rehabilitation of historic landscapes, as it proposes to significantly alter the historic character of Bridge Square and Riverside Park. The current design has incorporated a great deal of formality, complexity, and new geometry into the square and park. We are pleased that the current design retains the Water Street corridor, however, the paving and landscaping features and materials proposed throughout the park should be kept to a minimum. Areas and paths created by the paving materials, including planting beds which are proposed to introduce walls and formal edges on the north and south sides of Bridge Square, should be kept simple and minimal. We would recommend that the project pursue gentler edges and geometry for the site, especially in relation to the perimeter

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of Bridge Square and the proposed amphitheater area within Riverside Park. The semicircular shape that is currently proposed within Riverside Park, including the pergola, takes on a strong form which has not previously been present in the park. We recommend softening the amphitheater area into a gentler curvilinear shape to follow existing edges and simplifying the pergola. Additionally, we recommend that the design retain the evolved “teardrop” shape and characteristic informal openness of Bridge Square’s perimeter, especially the north and south edges, and avoid overly designed formal planting beds with low walls along its perimeter.

Archaeological Resources

We have reviewed the report: *Phase I Archaeological Investigation for the Bridge Square - Riverside Park Renovation Project, Northfield, Rice County, Minnesota* (June 2023) as prepared by 106 Group. One new archaeological site, site **21RC0076**, was identified as a result of the investigations. Based on the information provided in the report, we do not feel that we have been provided sufficient information at the Phase I reconnaissance survey level to agree that archaeological site 21RC0076 is eligible for listing in the NRHP as a contributing resource to the Northfield Commercial Historic District. While the survey report does provide results indicating potential significance and integrity, we consider the site unevaluated for NRHP eligibility. We agree with the consultant’s recommendation that if impacts to the site cannot be avoided, additional archaeological investigation will be needed to fully evaluate whether this site is eligible for listing in the NRHP, both individually and/or as a contributing resource to the historic district. The additional archaeological investigation should focus on assessing the integrity of the grist mill remnants and the former surface(s) of Bridge/Mill Square. We recommend that the City share historic photos of the square and park with the consulting archaeologist to aid in the evaluation. Some recent references related to the study of urban open spaces that may be relevant to designing/scoping additional archaeological investigations, particularly in relation to the association with specific events and the data potential, include “The Archaeology of Emptiness? Understanding Urban Open Spaces in the Medieval World” by Ben Jervis et al. (2021) and “Urban Open Spaces in Historical Perspective: A Transdisciplinary Typology and Analysis” by Benjamin W. Stanley et al. (2012).

Consulting Party and Public Engagement

Thank you for providing a schedule and summary of the City’s broader consultation efforts for this project. We understand that the City has been consulting with various constituent groups, including the Northfield Heritage Preservation Commission, the Parks and Recreation Advisory Board, the Arts and Cultural Commission, City Staff, the Mayor, and the City Council. 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 the level of detail-related archaeological site data. Bridge Square is currently present and well-known, so the archaeological evidence of the square doesn't present sensitive information that the public doesn't already know existed. Also, the grist mill is mapped on historical maps and pictured on historic photographs which are publicly accessible, so similarly, the recently confirmed archaeological evidence of the mill doesn't present information the public couldn't already access. The City’s consultant can provide guidance on how to best document, for both stakeholders and the public, the recently 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. Please take our above comments and recommendations into consideration as the design for this project proceeds. If you have any questions regarding our comments 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: Reeve Needham, Assistant City Planner
Barbara Evans, Chair, Northfield Heritage Preservation Commission