

January 24, 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
60% Design
Northfield, Dakota and Rice Counties
SHPO Number: 2022-1266

Dear David Bennet:

Thank you for continuing consultation on the above referenced project. Information received in our office on December 11, 2023, 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 have reviewed the following documentation that was submitted to our office on December 11, 2023:

- 106 Group Letter: *Design Review for Bridge Square-Riverside Park Improvement Project – Phase I, Northfield, Dakota and Rice Counties, SHPO Number: 2022-1266* (December 11, 2023)
- *60% Construction Documents: Northfield Bridge Square Riverfront & Square Improvements, 12 Bridge Square, Northfield, MN 55057* (09/26/2023, Damon Farbor Landscape Architects)
- *60% Visuals/Renderings – Site Plan, Views Facing Downtown, and Views Facing the River*

Our comments are provided below.

Design Review

Based on our review of the submitted documentation, we are pleased to see that the design has been refined in response to comments received from our office, the Northfield Heritage Preservation Commission, and Northfield community members. In our opinion, the current design is much more compatible with the forms of both Riverside Park and Bridge Square, and we have determined that the project, as currently proposed in the 60% construction documents, has been designed in accordance with the SOI Standards. We look forward to reviewing the 90% construction documents when they become available.

Archaeological Resources

As stated previously, 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.

Consulting Party and Public Engagement

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 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. Please take our above comments into consideration as the design for this project proceeds. 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: Barbara Evans, Chair, Northfield Heritage Preservation Commission