

DATE

Sarah J. Beimers
Manager of Government Programs and Compliance
State Historic Preservation Office
Administration Building #203
50 Sherburne Avenue
St. Paul, MN 55155

RE: Sweeney Property and Schroeder Brick House Project
Shakopee, Scott County, Minnesota

Dear Ms. Beimers:

This letter is intended as a follow-up to the Minnesota Department of Natural Resources (DNR) and the State Historic Preservation Office's (SHPO) December 20, 2019 email communication concerning conducting a cultural resources survey for the Sweeney Property and Schroeder Brick House Project (Email from Sarah Beimers, Environmental Review Program Manager, SHPO, to Mai Neng Moua, Parks and Trails Division Grant Manager, Department of Natural Resources [MnDNR], December 20, 2019).

The City of Shakopee is receiving a federal Land and Water Conservation Fund (LWCF) grant to complete a land swap of former LWCF land in Lion's Park for four parcels of land, located about 1.5 miles (2.44 kilometers [km]) to the northeast and totaling 8.66 acres (3.5 hectares [ha]), known as the Sweeney Property and Schroeder Brick House. Therefore, the Project must comply with Section 106 of the National Historic Preservation Act (NHPA) and applicable state statutes governing cultural resources, including the Minnesota Historic Sites Act, Minnesota Field Archaeology Act, and Minnesota Private Cemeteries Act.

In compliance with Section 106 of the NHPA, an Area of Potential Effects (APE), accounting for direct and indirect effects from the proposed Project, has been recommended and cultural resources surveys have been completed within the recommended APE. As the federal action consists of a land swap, the APE is the same as the Project area and includes approximately 8.66 acres (3.5 ha).

Within the APE, from June to November of 2020, the 106 Group conducted a reconnaissance and intensive architectural history survey and a Phase I and II archaeological survey. During the reconnaissance architectural history survey, three individual properties were identified within the APE that had not previously been evaluated. These properties (SC-SPC-094, SC-SPC-097, SC-SPC-099) are recommended not eligible for listing in the National Register of Historic Places (NRHP) due to a lack of historical significance. During the intensive architectural history survey, one potential district was identified within the APE that had not previously been evaluated. Individual properties associated with this district include two properties located within the APE that had not been previously evaluated (SC-

SPC-095 and SC-SPC-096), one property located outside of the APE that had been previously evaluated at a reconnaissance level (SC-SPC-050), and one property located outside of the APE that had not been previously evaluated (SC-SPC-098). Three of these properties (SC-SPC-050, SC-SPC-095, SC-SPC-098) are recommended not eligible for listing in the NRHP due to a lack of historical significance and/or a loss of historical integrity. One individual property, the Herman Schroeder House (SC-SPC-096), is recommended individually eligible for listing in the NRHP under Criterion B for its association with Herman Schroeder. The district, the Schroeder Brick and Lime Manufacturing Company Brickyard (SC-SPC-093), is recommended not eligible for listing in the NRHP due to a loss of historical integrity. Upon concurrence of eligibility of the Herman Schroeder House, the City of Shakopee intends on moving forward with the preparation of a National Register nomination for the house.

The Phase I archaeological survey included visual assessment and the excavation of 69 shovel tests. As a result of Phase I survey, the boundaries of one previously documented historical archaeological site (21SC0034) were expanded, and one precontact archaeological site (21SC0119) was identified. Both sites were assessed as potentially eligible for listing in the NRHP. Therefore, a Phase II evaluation was conducted. The Phase II archaeological evaluation included the excavation of additional close interval shovel tests and five 1x1 meter (m) excavation units. As a result of the Phase II evaluation, additional precontact material – 18 pieces of lithic debitage including one Besant lithic point – was recovered from site 21SC0119. All of the lithic material recovered from the site is from locally available sources. Site 21SC0119 was also found to be entirely disturbed, with post-contact and modern material present at lower depths than precontact artifacts. Site 21SC0119 is not known to be associated with historically significant events or individuals (Criteria A and B), nor does it embody the characteristics that represent the work of a master (Criterion C). While the Besant lithic point is diagnostic to the Woodland period, the disturbance observed within the site indicates a lack of site integrity. Therefore, the site has not yielded, nor does it have the potential to yield, information important to an understanding of prehistory (Criterion D). Site 21SC0119 is recommended as not eligible for listing in the NRHP.

As a result of the Phase II evaluation, additional mixed post-contact and modern material was recovered from site 21SC0034, including brick fragments, glass, ceramics, nails, metal fragments, a plastic button, and industrial waste products. Apart from a single area near the historic brick kiln, all additional shovel testing and excavation units excavated within 21SC0034 indicate that the site is heavily disturbed. Modern material such as plastic foil, erosion tarps, and wrappers were found at or below the depth of historical materials associated with brick manufacturing. Further, precontact material (lithic debitage) was recovered throughout site 21SC0034 at varying depths both above and below modern materials. Though Site 21SC0034 may be associated with historically significant events (introduction of early industry in Shakopee) or individuals (Herman Schroeder and Family) (Criteria A and B), it does not embody the characteristics that represent the work of a master (Criterion C). Further, intact portions of the site consist only of sheet refuse layers alternating between brick, limestone, and slag, with no diagnostic artifacts. Therefore, since the majority of the site is disturbed, it lacks sufficient integrity to convey any significance under Criteria A or B. In addition, the site has not yielded, nor does it have the potential to yield, information important to an understanding of history or prehistory (Criterion D). Therefore, site

21SC0034 is recommended as not eligible for listing in the NRHP, and no further archaeological work is recommended for the Project.

We request your concurrence with our recommended APE and identification of historic properties following your review of the *Cultural Resources Survey for the Sweeney Property and Schroeder Brick House Project* report. Your timely response is much appreciated. Please contact **ADD CITY CONTACT AND CONTACT INFO** with any questions.

Finally, because the Project must also comply with the Minnesota Field Archaeology Act and the Minnesota Private Cemeteries Act, the cultural resources report has also been provided to OSA for concurrent review.

Sincerely,

CITY CONTACT

Enclosures: *Cultural Resources Survey for the Sweeney Property and Schroeder Brick House Project*
report
Minnesota Property Inventory Forms (8)