

Appendix I

Cultural Resources Literature Review Update Phase I Archaeology Survey

Community Wind South Repower Project
Nobles County, Minnesota

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April 15, 2020

Mehul Mehta
Greenbacker Renewable Energy Corporation
11 East 44th Street, Suite 1200
New York, NY 10017

Re: Phase Ia Cultural Resources Literature Review for the Community Wind South Project
File: R0026682.00

Greenbacker Renewable Energy Corporation (Greenbacker) contracted Westwood Professional Services, Inc. (Westwood), to conduct a Phase Ia Cultural Resources Literature Review for the Community Wind South Project (Project) in Nobles County, Minnesota (Exhibit 1). The current Project intends to retrofit 15 existing turbines with longer blades and different nacelles, as well as the installation of new transformers at the base of each turbine. Application to the Department of Commerce and the Minnesota Public Utilities Commission will be required for the Project.

The literature review examined documentary resources including historic maps, archaeological site files, historic structure inventories, and previous cultural resource survey reports. Rigden Glaab, M.A., RPA, meets the Secretary of Interior’s Professional Qualification Standards for archaeology as stipulated in 36 CFR Part 61 and served as Principal Investigator for the Project. The literature review study area included the Project area and a one-mile “buffer” zone (Table 1, Exhibit 1).

Table 1: Sections in Project Area and One-Mile Buffer

Township	Range	Sections in Project Area	Sections in Buffer
103	41	17, 18, 19, 20, 30	7, 8, 9, 16, 21, 29, 28, 31, 32
103	42	13, 23, 24	11, 12, 14, 15, 22, 27

On March 26, 2020, Westwood Architectural Historian Sara Nelson, reviewed files at the State Historic Preservation Office (SHPO) at the Department of Administration in St. Paul, MN. The review examined historic/architectural structure inventory files, archaeological site files, and the National Register of Historic Places (NRHP) database, to obtain a list of previously recorded archaeological (historic and prehistoric) and historic/architectural resources within the Project area and a one-mile “buffer” zone. Cultural Resources Manager Ryan P. Grohnke reviewed files on the online Portal maintained by the Office of the State Archaeologist (OSA).

Other documentary research sources used included county and township histories, historic contexts, environmental background, historic maps and atlases, historic J.W. Trygg Maps (1969) developed

from original township land survey records, *An Illustrated Historical Atlas of the State of Minnesota* (Andreas 1874), and the *Standard Atlas of Nobles County* (Ogle & Co. 1914).

Previous Cultural Resources Investigations

A review of survey reports at SHPO revealed that three previous Cultural Resources surveys have been conducted for earlier wind farm projects in the vicinity of this Project. In 2009, the “Cultural Resources Literature Review,” “Phase I Archaeological Survey,” and “Phase I Archaeological Survey Addendum I” were completed for the Nobles County Wind Farm (operating adjacent to the Project) by The 106 Group Ltd. The report identified eight archaeological sites; two are located in the one-mile buffer (21NO0064 and 21NO0069), and none are located within the Project area. All eight sites were recommended not eligible for listing in the NRHP and no further archaeological work was recommended prior to construction. The “Archaeological Survey for the Proposed Community Wind South LWECS Project” was completed in 2012 by Blondo Consulting, LLC. The survey included “an attempt to relocate archaeological sites 21NO0028 “The Indian Hill Site II” and 21NO0029 “The Indian Hill Site I,” which are located within the Project area, but “no evidence of either site was found.” The survey identified archaeological Summit Lake Site (21NO0071) within the Project area, which was recommended not eligible for listing in the NRHP. The report did not recommend further archaeological work prior to construction.

An “Architectural Survey for the Proposed Community Wind South LWECS Project” was completed in 2012 by Blondo Consulting, LLC. Of the 77 resources identified, ten are located within the Project area and 36 are located within one mile of the Project. Nearly all resources were recommended not eligible for listing in the NRHP. Of the three resources recommended potentially eligible, one is located within the Project area (NO-SLT-038). SHPO has not issued concurrence of eligibility for any of the properties.

Archaeological Sites

Three previously recorded archaeological sites are located within the Project area (Table 2, Exhibit 1). The 2012 survey identified Summit Lake (21NO0071), consisting of a small lithic scatter site. The survey could not relocate the previously identified Indian Hill Site II (21NO0028) or Indian Hill Site I (21NO0029). None of these sites were recommended eligible for the NRHP.

There are four sites located within one mile of the Project area. The Elsing Site (21NO0030) was identified in 1979; the 2009 report noted that “the site’s NRHP eligibility was not determined [in 1979]; however the commentary on the site form states that the site should be tested.” The 2009 survey identified two sites, 21NO0064 and 21NO0069, which both consisted of a single chert flake and were recommended not eligible for the NRHP because of their poor contextual integrity. Site 21NOj is an alpha site, which is a site lead from historical documentation or an informant report that has not been verified by a professional archaeologist. Site 21NOj is listed as a mounds site; the SHPO database and inventory form did not provide further details and the site has not been evaluated for NRHP eligibility.

Table 2: Archaeological Resources in Project Area and One-Mile Buffer

SHPO Inventory ID	Site Name	Site Type	Cultural Affiliation	NRHP Eligibility	Project/Buffer
21NO0028	Indian Hill II	Artifact scatter	Prehistoric	Not Evaluated	P
21NO0029	Indian Hill I	Artifact scatter	Prehistoric	Not Evaluated	P
21NO0030	Elsing			Not Evaluated	B
21NO0064		Single Artifact	Prehistoric	Not Eligible	B
21NO0069		Single Artifact	Prehistoric	Not Eligible	B
21NO0071	Summit Lake Site		Prehistoric	Not Eligible	P
21NOj		Mounds	Prehistoric	Not Evaluated	B

Historic/Architectural Resources

Forty-six historic/architectural resources have been previously inventoried within one mile of the Project area, ten of which are located within the Project boundaries (Table 3; Exhibit 1).

Table 3: Historic/Architectural Resources in Project Area and One-Mile Buffer

SHPO Inventory ID	Name	Location	NRHP Eligibility	Project/Buffer
NO-LRK-006	Farmstead	NWC of 200th St & Fellows Ave	Not Eligible	P
NO-LRK-007	Farmstead	es Fellows bw 200th & 210th St	Not Eligible	B
NO-LRK-011	Farmstead	ws Erickson Ave bw 190th & 200th St	Not Eligible	B
NO-LRK-012	Farmstead	SWC 200th St & Erickson Ave	Not Eligible	B
NO-LRK-013	Farmstead	ws Erickson Ave bw 190th & 200th St	Not Eligible	B
NO-LRK-015	Farmstead	SEC Fellows & 210th St	Not Eligible	B
NO-LRK-017	Farmstead	ws Heiselroth Ave bw 190th & 200th St	Not Eligible	P
NO-LRK-018	Farmstead	27902 180th St	Not Eligible	B
NO-LRK-019	Farmstead	27481 170th St	Potentially Eligible	B
NO-LRK-022	Farmstead	es Fellows Ave bw 170th & 180th St	Not Eligible	B
NO-LRK-023	Farmstead	NWC 180th St & Fellows Ave	Not Eligible	B
NO-LRK-024	Farmstead	ss 180th St bw Erickson & Fellow Ave	Not Eligible	B
NO-LRK-025	Farmstead	es Fellows Ave bw 180th & 190th St	Not Eligible	B
NO-LRK-026	Farmstead	18564 Fellows Ave	Not Eligible	B
NO-LRK-027	Farmstead	ns 190th St bw Erickson & Fellows Ave	Not Eligible	B
NO-LRK-028	Farmstead	ss 190th St bw Erickson & Fellows Ave	Not Eligible	B
NO-LRK-029	Farmstead	SEC 190th St & Fellows Ave	Not Eligible	B
NO-LRK-030	Farmstead	ws Fellows Ave bw 190th & 200th St	Not Eligible	B
NO-LRK-031	Farmstead	NEC 200th St & Fellows Ave	Not Eligible	P
NO-SLT-003	Farmstead	ns 200th St bw Heiselroth and Jones Ave	Not Eligible	P
NO-SLT-004	Farmstead	NWC 200th St & Jones Ave	Not Eligible	P
NO-SLT-020	Farmstead	SE corner of 200th St & King Ave	Potentially Eligible	B
NO-SLT-021	Farmstead	ns 200th St bw King & Knauf Ave	Not Eligible	B

SHPO Inventory ID	Name	Location	NRHP Eligibility	Project/ Buffer
NO-SLT-022	Farmstead	19032 King Ave	Not Eligible	B
NO-SLT-023	Farmstead	ns 190th St bw King & Knauf Ave	Not Eligible	B
NO-SLT-024	Farmstead	SWC King Ave & 180th St	Not Eligible	B
NO-SLT-025	Farmstead	NWC 180th St & King Ave	Not Eligible	B
NO-SLT-026	Farmstead	NEC 180th St & King Ave	Not Eligible	B
NO-SLT-030	Farmstead	SWC of Jones Ave & 170th St	Not Eligible	B
NO-SLT-031	Farmstead	17462 Jones Ave	Not Eligible	B
NO-SLT-032	Farmstead	ss 180th St bw Heiselroth and Jones Ave	Not Eligible	P
NO-SLT-033	Farmstead	18537 Jones Ave	Not Eligible	P
NO-SLT-034	Farmstead	NEC 190th St & Jones Ave	Not Eligible	P
NO-SLT-035	Farmstead	ns 190th St bw Jones & King Ave	Not Eligible	B
NO-SLT-036	Farmstead	ss 190th St bw Jones & King Ave	Not Eligible	B
NO-SLT-038	Farmstead	NEC 200th St & Jones Ave	Potentially Eligible	P
NO-SLT-039	Farmstead	SEC of 200th St & Jones Ave	Not Eligible	B
NO-SLT-040	Farmstead	ws Jones Ave bw 200th & 210th St	Not Eligible	P
NO-SLT-041	Farmstead	NEC 210th St & Jones Ave	Not Eligible	B
NO-SLT-042	Farmstead	SWC of 210th St & Jones Ave	Not Eligible	B
NO-SLT-043	Farmstead	Jones Ave bw 210th & 220th St	Not Eligible	B
NO-SLT-044	Farmstead	ws Jones Ave at 220th St	Potentially Eligible	B
NO-SLT-045	Farmstead	NWC 220th St & Jones Ave	Not Eligible	B
NO-SLT-047	Farmstead	ss 210th St bw Heiselroth & Jones Ave	Not Eligible	B
NO-SLT-048	Farmstead	SWC 210th St & Heiselroth Ave	Not Eligible	B
NO-XXX-001	Farmstead	Heiselroth Ave bw 200th & 210th St	Not Eligible	B

Other Sources

Other archival resources investigated included the historic J.W. Trygg Maps (1969) based on the original government land survey of the townships, *An Illustrated Historical Atlas of the State of Minnesota* (Andreas 1874), and the *Standard Atlas of Nobles County* (Ogle & Co. 1914). Neither the Trygg Maps nor the Andreas Atlas showed any potential cultural resources. In the 1914 Ogle Atlas, State Highway 266 is indicated running northwest out of Reading, and generally parallel to the Chicago & Rock Island railroad corridor. In addition to homesteads throughout the area, four schools and one church were indicated within the Project buffer. There were no other potential cultural resources.

Recommendation

Because this Project constitutes a re-power consisting of retrofitting existing turbines, which will most likely use existing infrastructure, no new ground disturbance is anticipated. In that event, no further cultural resource investigations are recommended. Westwood recommends a Phase I Archaeological Survey for previously undisturbed locations that may be physically impacted by

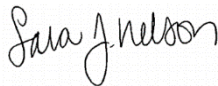
construction of the proposed Project. New work at existing turbines and utilization of existing roads or previously utilized crane walks will not necessitate archaeological survey.

None of the historic architectural resources within and around the Project area are eligible or listed in the NRHP. The activities proposed as a part of this Project will have no effect on historic properties. Westwood does not recommend further review of historic architectural resources.

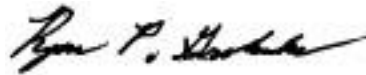
If the Project is federalized, the scope of required cultural resource investigations would be determined by the functioning Federal lead agency in cooperation with the State Historic Preservation Office (SHPO) and pertinent Tribal Historic Preservation Offices (THPO) as defined in both Section 101 of the National Environmental Policy Act of 1969 (NEPA) and Section 106 of the National Historic Preservation Act of 1966 (as amended) (NHPA).

Sincerely,

WESTWOOD PROFESSIONAL SERVICES



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ARCHITECTURAL HISTORIAN
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