In the Matter of the Applications of Dodge County Wind, LLC for a Certificate of Need, a Site Permit, and a Route Permit for the up to 259 MW Large Wind Energy Conversion System and associated 161 kV Transmission Line in Dodge, Mower and Steele Counties, Minnesota

PUC Docket No. IP-6981CN20-865
WS-20-866
TL-20-867

Directed To: Danell Herzig

EERA Question No. 7

Response Due By: October 20, 2023

Question(s): Cultural Resource Review

Please file a Phase I Cultural Resources Review that covers the route alternatives identified [] in the July 27, 2023, scoping order in the route permit docket (20-867).

Response:

On October 20, 2023, DCW filed the requested Cultural Resources Literature Search ("Report") in Docket 20-0867, a copy of which is attached to this response.

In accordance with Minn. R. 7829.0500 and 7829.0400, subp. 4, and Minn. Stat. Chapter 13 ("Government Data Practices Act"), DCW is designating sensitive information contained in the attached Report as nonpublic security information subject to protection under the Government Data Practices Act. Specifically, DCW has designated Figure 2, which identifies the location of sensitive archeological sites contained in the Report, as nonpublic data pursuant to Minn. Stat. § 307.08, subd. 11, Minn. Stat. § 13.37, and Section 304 of the National Historic Preservation Act. DCW is providing both NON-PUBLIC and public versions of the Report.

Response date: October 20, 2023
Response by: Danell Herzig
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CULTURAL RESOURCES LITERATURE SEARCH

DODGE COUNTY WIND TRANSMISSION LINE
DODGE AND MOWER COUNTIES MINNESOTA

Prepared for

Dodge County Wind, LLC
700 Universe Boulevard
Juno Beach, FL 33408

Submitted by Atwell, LLC

SHPO No. 2017-1619

Atwell Project No. 16002517

October 16, 2023

Executive Summary

Dodge County Wind, LLC (DCW), a wholly owned subsidiary of NextEra Energy Resources, LLC, is proposing the construction of the Dodge County Wind Transmission Line (the Project). The Project will connect the proposed Dodge County Wind Energy Facility in Dodge County to the existing Great River Energy (GRE) Pleasant Valley Substation located in Mower County. The Project is currently considering three potential routes for this transmission line, Route A, Route B, and Route C. Each of the three routes are approximately 27 miles long and vary between 160 and 200 feet in width (Project Area). DCW has applied for a Public Utility Commission (PUC) route permit (PUC Docket No IP6981/TL-20-867), and the Minnesota Office of the State Archaeologist (OSA) will review the project as part of the PUC application process. This Project does not involve federal funding or permitting and is not subject to federal historic preservation regulations.

Atwell, LLC (Atwell) was contracted to conduct an updated cultural resources literature search for the proposed Project to update cultural resources investigations originally conducted for the Project in 2018 and again in 2022 to identify any cultural resources that may have been recorded since that time. This report also incorporates changes to the Project Area that have occurred since 2022. The cultural resources literature search is designed to accomplish the following: (1) identify currently known cultural resources and ascertain their recorded potential eligibility for listing in the National Register of Historic Places (NRHP), Minnesota State Register of Historic Places (MSRHP), and the Minnesota State Historic Sites Network (MSHSN); (2) aid DCW in complying with state cultural resources laws, if applicable; (3) aid in project planning and avoidance of tribal and cultural sensitive areas; and (4) produce a report documenting the results of the literature search.

Atwell conducted the cultural resources literature search by examining Minnesota State Historic Preservation Office (MnSHPO) and the OSA electronic records in December 2020, March 2022, and again in September 2023 to identify cultural resource records within the Project Area and a one-mile buffer of the Project Area. County and township histories, historic maps, county atlases, the Andreas Atlas, county soil surveys, and current and historic aerial photographs were also examined. The MnSHPO records identified two architectural resources within the Project Area and an additional 22 architectural resources within the one-mile buffer, for a total of 24 documented resources. None of the previously recorded architectural resources are listed in the NRHP, MSRHP, or the MSHSN. DCW has voluntarily avoided direct impacts to all recorded architectural resources within the Project Area. Therefore, no additional architectural investigation is recommended.

No archaeological sites have been recorded within the Project Area. Two recorded sites are located within the one-mile buffer.

One cemetery was identified within the one-mile buffer. As currently proposed, the Project will not impact any cemeteries or burial grounds, thus avoiding potential violations of Minnesota Statute 307.08, which protects private cemeteries and burial grounds.

Atwell recommends that currently proposed locations within undisturbed land that have not been surveyed should be examined by a qualified archaeologist to identify any unrecorded archaeological sites that could possibly be present in these locations.

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1 INTRODUCTION

Dodge County Wind, LLC (DCW), a wholly owned subsidiary of NextEra Energy Resources, LLC, is proposing the construction of the Dodge County Wind Transmission Line (the Project). The Project will connect the proposed Dodge County Wind Energy Facility in Dodge County to the existing Great River Energy (GRE) Pleasant Valley Substation located in Mower County. The Project is currently considering three potential routes for this transmission line, Route A, Route B, and Route C. Each of the three routes are approximately 27 miles long and vary between 160 and 200 feet in width (Project Area). DCW has applied for a Public Utility Commission (PUC) route permit (PUC Docket No IP6981/TL-20-867), and the Minnesota Office of the State Archaeologist (OSA) will review the project as part of the PUC application process. This Project does not involve federal funding or permitting and is not subject to federal historic preservation regulations.

Atwell, LLC (Atwell), was contracted to conduct an updated cultural resources literature search for the proposed Project. This report updates the cultural resources literature search that was originally conducted for the Project in 2018 (Pfennig and Kotwasinski 2018) and updated in 2022 (Atwell 2022), addresses significant changes in the transmission line route, and identifies any cultural resources that may have been recorded since that time. A large portion of the Project has been rerouted since the 2022 cultural literature search was conducted.

1.1 PROJECT DESCRIPTION AND LOCATION

The Project is planned to begin at the proposed Dodge County Wind Energy Facility substation and will then traverse approximately 27 miles to connect to an existing GRE substation located just east of the City of Sargeant in Mower County. The Project is currently considering three potential routes for this transmission line: Route A, Route B, and Route C (**Figure 1**). For purposes of this report, all three routes (collectively termed the “Project”) were examined.

Currently, design of the project is underway and has not been finalized. The proposed line will use 161 kilovolt (kV) alternating current (AC) single-circuit monopole structures for approximately 24 to 25 miles of the Project and 161 kV AC double-circuit monopole structures for the remaining 2.5 miles where the Project will be co-located with the existing Pleasant Valley to Austin Northeast 161 kV transmission line owned by GRE. For the co-location, the DCW line and the structures will be placed within the existing GRE transmission line right-of-way. The proposed structure heights depend on terrain, span length, structure configuration, and other crossings or constraints. Final pole heights will be determined during detailed design to maintain all required clearances. The proposed pole height is not expected to exceed 160 feet above the ground, and average pole height will be 80 to 140 feet above ground line. Span lengths for the transmission line are planned to vary between 500 and 900 feet. **Table 1** provides the township names and section numbers crossed by the Project.

Table 1. Project Location

County	Township Name / City	Township	Range	Sections
Dodge	Ripley	106N	18W	13-15, 22-27
	Ashland	106N	17W	16-21, 27-36
	Hayfield	105N	17W	1-6, 9-16, 21, 22, 24, 25, 27, 28, 33, 34, 36
	Vernon	105N	16W	6, 7, 18-20, 29-32
Mower	Waltham	104N	17W	3, 4, 9-16
	Sargeant	104N	16W	2–11, 13–24
	Pleasant Valley	104N	15W	18, 19

1.2 ENVIRONMENTAL SETTING AND HISTORY

The Project is in the Southeast Riverine West (3w) archaeological region. The Southeast Riverine West archaeological region covers most of southeastern Minnesota, including all of Dodge and Mower counties (Hudak et al. 2002). Archaeological resources are predominantly concentrated along the Mississippi River and its tributaries in this area and expected resource locations would be near water sources on bluff tops and terraces. The landscape is characterized by stream-dissected terrain. No natural lakes are in the region; however, three major river systems extend westward from the Mississippi into the region's interior: the Cannon, the Zumbro, and the Root. The climate is known to be the mildest in the state with a growing season of at least 160 days per year and consistent average rainfall.

1.2.1 Regional Setting

The Environmental Protection Agency (EPA) Ecoregion mapping data (EPA 2015) indicates that the Project is located within the Eastern Iowa and Minnesota Drift Plains (EIMDP) Level IV ecoregion of the Western Corn Belt Plains ecoregion Level III (EPA 2015). The EIMDP ecoregion receives approximately 24 to 36 inches of precipitation per year and is characterized by fertile undulating plains with scattered stream systems covered by glacial tills dominated by row crops and some pasture (EPA 2015).

The Minnesota Department of Natural Resources (MNDNR) Ecological Classification System further defines the Project Area as the Eastern Broadleaf Forest Province (EBFP), a transition zone between the western prairies and eastern mixed conifer/deciduous forests (MNDNR 2017). The EBFP includes the Minnesota and Northeast Iowa Morainal subsection (222M), which is characterized by deciduous forest, woodland, and prairie in a hummocky morainal landscape and the Oak Savanna subsection (222Me) which is historically covered by bur oak savanna, patches of tallgrass prairie, and maple-basswood forest on gently rolling hills (MNDNR 2017).

The Project is situated among the rural communities of Dodge Center, Hayfield, Waltham, Vernon, and Sargeant, Minnesota. Small farmsteads are scattered in the vicinity of the Project, and public roads are generally situated in a grid-like arrangement. Overall, the Project Area is dominated by agricultural cropland and a moderately extensive network of agricultural ditches with intermittent and ephemeral streams, many of which support herbaceous riparian buffers. The general topography of the Project has an undulating, rolling relief with elevations between 1,274 and 1,390 feet above mean sea level. Topography in the vicinity of the Project generally slopes to the east and is predominantly comprised of silty loam soils that were formed in glacial till and eolian deposits (NRCS 2020).

1.2.2 Environmental History

During the Pleistocene Ice Age (60,000 B.P to 17,000 B.P.), southeastern Minnesota was lightly glaciated with a stream-dissected terrain. From 17,000 B.P. to 15,500 B.P., Dodge and Mower counties were largely free of ice, but remained unattractive for human habitation largely due to sparse vegetation that allowed few animals to inhabit the region (Hudak et al. 2002). This climate kept human utilization of the region to a minimum. By approximately 14,000 B.P., the glaciers had completely melted, and Dodge and Mower counties were generally covered by an open boreal coniferous forest dominated by grasses and scattered conifer trees. As the glaciers receded, the ecology of the region became more diversified (Gibbon 2012).

From 8000 B.P. to 3000 B.P. the region encompassing the Project Area primarily consisted of prairie vegetation and animal associations. Typical mammals included buffalo, elk, skunk, badger, jackrabbit, ground squirrel, gopher, and coyote. Scattered forests of oak and hickory forests were present along stream valleys, around lakes, and on some plateaus and low hills. The most common tree species were oak, sycamore, cottonwood, elm, hackberry, maple, basswood, and beech. Hunter-gatherers entered prairies seasonally to hunt buffalo. Likewise, small groups lived year-round on the prairies (Gibbon 2012).

From 3,000 B.P. to the present, deciduous forest encompassed much of the region encompassing the Project Area. Deciduous forest was characterized by broadleaf deciduous trees with a wide variety of animal life present. Although white-tailed deer were the primary game animal, bison and badgers inhabited areas of open grassland. The climate of the province was still more moderate, with shorter winters, less snowfall, and longer, hotter summers. Soils were deeper and richer, and drainage systems much more mature than in northern Minnesota (Gibbon 2012).

Numerous small streams and seasonal washes were scattered throughout Dodge and Mower counties with few lakes dotting the region. When Euro-Americans began to settle the region, a vast majority of the landscape was composed of tall grass prairie with oak and hickory forests

along stream valleys. Climate in the region is among the mildest in the state with an annual precipitation range between 28 and 30 inches (Hudak et al. 2002).

1.3 CULTURE HISTORY

The following prehistoric and historic contexts were generated from previously prepared syntheses for the State of Minnesota and the Upper Midwest (Dobbs 1990a; 1990b; MnSHPO 1993; Hudak et al. 2002; Gibbon 2012). The Pre-Contact period is divided into four traditions: Paleoindian, Archaic, Woodland, and Plains Village and Mississippian/Oneota. These traditions are further defined by significant changes in how Native American communities exploited technology and food sources.

1.3.1 Paleoindian Tradition (12,000 to 8000 B.P)

This period is marked by the retreat of glacial ice and the draining of several lakes, including Lake Agassiz and Lake Superior. The Paleoindian occupations in Minnesota were characterized by low population density, and sites were often short-term, specialized activity areas that resulted in a sparse archaeological profile. Paleoindians adapted to a nomadic lifestyle living near game animals, sources of wood, chert, large streams, and other major water sources. The Paleoindians based their movements on the seasons, the availability of plants, and the migratory patterns of game animals.

Paleoindian Tradition archaeological sites are often identified by isolated projectile points and scatters of few lithic artifacts on the ground surface. Justice (1987) divides these projectile points into Early Paleoindian—Fluted Point Pattern (Clovis, Gainey, and Folsom points) and Late Paleoindian—non-fluted Lanceolate Point Pattern (Plano and Cody Complex points). Other lithic tool types associated with the patterns of the Paleoindian Tradition in Minnesota include bifacially flaked knives, simple choppers, adzes, and large scrapers (Dobbs 1990a).

1.3.2 Archaic Tradition (8000 to 2800 B.P.)

The end of the Pleistocene marked the end of the last Ice Age and the beginning of the Archaic period. The retreating glaciers exposed new land surfaces unlike any in present-day Minnesota. Expanses of prairie began to displace the forests, expansive lakes, and large, swift rivers fed by glacial runoff. Dietary and settlement patterns shifted in adaptation to environmental changes. More diverse plant and animal resources were utilized during the Archaic period, and the toolkit diversified to include ground and pecked stone tools, copper tools, and a wider variety of projectile point types. Archaic Tradition technology is characterized by a change in projectile point manufacture, shifting from lanceolate to notched and stemmed points.

During the Archaic period, regional differences in material culture began to develop. Four distinct Archaic Tradition contexts identified in Minnesota include the Shield Archaic, Lake-Forest Archaic, Prairie Archaic, and Eastern Archaic (Dobbs 1990a). Research suggests that community size increased from previous Paleoindian populations, yet remained small with day-to-day activities taking place at a series of small seasonal camps (Anfinson 1987). As with known Paleoindian sites, Archaic sites are relatively small and sparse.

1.3.3 Woodland Tradition (2800 B.P. to European Contact)

Throughout the Midwestern United States, the Woodland Tradition is generally divided into three periods: Early, Middle, and Late; however Anfinson (1987) has suggested that a division into Initial and Terminal periods may be more appropriate in Minnesota. The climate during this period shifted from dry and warm to moist and cool and began to stabilize to resemble the climate that exists in the state today (Anfinson 1990).

Woodland Tradition cultures exhibit evidence of an increasingly sedentary lifestyle. This is evident in the manufacturing of ceramic vessels, building burial mounds, and cultivating specific plant species (Dobbs 1990a). The original divisions of Early, Middle, and Late Woodland were differentiated by their changes in technology. Ceramics during the Early Woodland period are normally thick and crude with cord-marked decoration on the exterior. During the Middle Woodland there is early evidence of earthen burial mounds. The Late Woodland period continues the tradition of ceramics and burial mounds, but ceramic decorations and styles become more regionalized (Anfinson 1990). Despite significant changes in many aspects of the Woodland culture, archaeological research indicates that life during the Woodland Tradition remained similar to that of the Archaic period, with a dependence upon a diverse, seasonal resource base of plants and animals (Anfinson 1987:222). Site types assigned to the Woodland Tradition throughout the region range from small, limited-use sites to large village and habitation sites.

1.3.4 Plains Village and Mississippian/Oneota Traditions (1100 B.P. to European Contact)

During the Plains Village and Mississippian/Oneota Traditions, archaeological sites in Minnesota exhibit significant changes in subsistence and settlement patterns. Populations became larger and even more regionalized than was typical during previous periods. In addition, ceramic vessels were manufactured using different forms and decoration, agriculture intensified, and settlement patterns shifted to larger and more permanent villages (usually near river settings). Archaeologists attribute sites that exhibit these cultural changes to two major traditions: Plains Village and Mississippian/Oneota. These traditions are split further based on region: the Plains Village Tradition is typical in the western part of the state, and the eastern part of the state

typically exhibits the Mississippian Tradition (Anfinson 1987). These traditions last from the end of the Terminal Woodland Tradition to first contact with European explorers (Anfinson 1987).

Anfinson (1987) has suggested the Plains Village Tradition and the Mississippian/Oneota Traditions developed due to regionalization of groups that allowed the creation of distinctive ideas and life-ways. Archaeological evidence suggests the Plains Village complexes developed out of an indigenous Late Woodland base; however, archaeologists are unsure how the Oneota complexes developed (Dobbs 1990a). Plains Village and Oneota site types are similar to those associated with the Woodland Tradition. The archaeological remains of these complexes range from burial mounds to small, limited-use sites and extensive habitation sites. Site location remains consistent with the Woodland Period.

1.3.5 Contact/Post-Contact Period (1639 to Present)

The Contact period generally refers to the span of time extending from the first European explorations until intensive Euro-American settlement of the region. Minnesota's historical period began in 1673 when French explorers Jacques Marquette and Louis Joliet encountered the upper portion of the Mississippi River. During the time of initial contact, the Ioway, Santee Dakota, and possibly the Oto occupied the southeastern portion of Minnesota (Dobbs 1990b). The territory containing modern-day Minnesota was claimed during this period by Spain, France, Great Britain, and the United States.

Settlement and exploration in Minnesota were driven by the establishment, operation, and adaptation of fur trading and exchanging goods. The presence of French and British explorers caused changes to the Native American populations. Native American populations migrated from the east, and certain areas of Minnesota saw a depopulation of native peoples because of introduced diseases and warfare (Dobbs 1990b). A large-scale evacuation of Native Americans in Minnesota, after growing tensions, allowed for further settlement of the area by Europeans.

The large-scale evacuation of Native Americans was a result of an armed conflicted between the United States and the Dakota Sioux Indians. Throughout the late 1850s, treaty violations by the United States and unfair annuity payments by Indian agents caused increasing tension among the Dakota Indians (Ginkel et al. 2016). Over the duration of several months, battles between the Dakota and the settlers, and later the United States Army, took place throughout the Minnesota River valley. The war ended on December 26, 1862, when 38 Dakota Indians were hanged in Mankato in the largest mass execution in U.S. history (Ginkel et al. 2016). Afterward, the government forced most of the remaining Dakota to leave Minnesota.

Minnesota became a territory in 1849 and achieved statehood on May 11, 1858 (Dodge County Historical Society 2017). The first European settlers arrived by steamboats via major rivers and tributaries. Many towns developed into agricultural processing and distribution centers.

Industries such as milling and brewing became widespread throughout Minnesota (Hill 1884). In addition to milling, Minnesota was a leader in lumbering and iron mining (Hill 1884).

The rivers, alongside which many towns were established, acted as a major source of transportation and power for these industries. The establishment of railroads in Minnesota in the late nineteenth century spurred rapid growth in the agriculture industry and became a major source of transportation for Minnesota's leading industries (Hill 1884).

Dodge and Mower counties were historically inhabited by the Mdewakanton Sioux, the Sauk, and the Fox Indians (Dodge County Historical Society 2017). The region was common hunting and combat ground for Native Americans until 1853 when their interests in the land were relinquished as part of the Mendota Treaty. Though Native Americans continued to reside in the area 1853, eventually the population declined due to smallpox and loss of land.

The early European settlers of the area were predominantly of New England birth (Dodge County Historical Society 2017). By 1855, settlement had progressed rapidly in Dodge County with the establishment of farms, roads, a hotel, and a tavern. The county was established under the Minnesota territorial government in 1855, with Mantorville as the County Seat (Dodge County Historical Society 2017). The county is named for Henry Dodge, a two-time governor of Wisconsin. Meanwhile, Mower County was officially created in 1855 and the population grew dramatically between 1860 and 1870 (Mower County 2022). The arrival of railroads enabled the further development of many towns in Mower County.

In the early history of Dodge and Mower counties, agriculture was a leading industry producing wheat, corn, oats, barley, and potatoes in commercial quantities (Dodge County Historical Society 2017). After a decline in wheat production, dairying and diversified farming increased rapidly. The Dodge County Agricultural Society established itself in 1857 (Hill 1884). In that same year, the Dodge County Agricultural Society held the first county fair, which was also the first county fair in the Minnesota Territory (Hill 1884).

2 RESEARCH DESIGN

2.1 OBJECTIVES

The objectives of the cultural resources literature search are as follows: (1) identify currently known cultural resources and ascertain their recorded potential eligibility for listing in the National Register of Historic Places (NRHP), Minnesota State Register of Historic Places (MSRHP), and the Minnesota State Historic Sites Network (MSHSN); (2) aid DCW in complying with state cultural resources laws, if applicable; (3) aid in project planning and avoid tribal and cultural sensitive areas; and (4) produce a report documenting the results of the literature search.

2.2 RESEARCH METHODS

Atwell's literature search consists of an examination of files from the Minnesota State Historic Preservation Office (MnSHPO) and the OSA Due to the project's longevity and evolving nature, Atwell has requested electronic records from the MnSHPO a total of three times. Electronic records were initially requested from the MnSHPO on October 7, 2020 and were received on October 7, 2020. Records were requested again on February 21, 2022 and were received on March 9, 2022. Atwell then requested electronic records once more on September 7th, 2023 and received results on September 7th, 2023. The OSA records were reviewed electronically utilizing the OSA Portal online mapping database in October 2020, January 2021, March 2022, and September 2023. These The literature search assists in identifying previous cultural resource investigations, previously recorded archaeological sites, the potential for sites within the Project Area, and previously recorded architectural resources.

The recorded NRHP eligibility of resources identified by the literature search are based on the National Register Criteria in 36 CFR Part 60.1, guidelines established by the National Park Service, and historic contexts developed by the MnSHPO. In order to be eligible for NRHP listing, a cultural resource must retain integrity and meet one or more of the following criteria:

A. Be associated with events that have made a significant contribution to the broad patterns of our history; or

B. Be associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value, or represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or be likely to yield, information important in prehistory or history.

A cultural resource must possess several characteristics in order to retain sufficient integrity for listing in the NRHP. There are seven aspects of integrity: location, design, setting, materials,

workmanship, feeling, and association. The three aspects of integrity that are specifically relevant to archaeological sites are location, materials, and association.

3 LITERATURE SEARCH RESULTS

The literature search included review of records within the Project Area and within a one-mile buffer surrounding the Project Area. Records reviewed included state archaeological and historic site files available from the OSA and MnSHPO, NRHP data available from the National Park Service, and state historic architecture inventory data available from the MnSHPO. Additionally, county and township histories and historic maps, including Bureau of Land Management (BLM) General Land Office (GLO) plat maps (BLM 2020), county atlases (The Farmer Magazine 1914a; The Farmer Magazine 1914b), the Andreas Atlas (Andreas 1874), county soil surveys, and current and historic aerial photographs, were examined. Recorded architectural resources and archaeological sites located within the Project Area and one-mile buffer are depicted in **Figure 2**.

3.1 HISTORICAL ATLAS AND MAP REVIEW

Review of GLO Record Original Survey Maps ranging in dates from 1854 to 1856 (BLM 2020) do not depict potential cultural resources within the Project Area or within the one-mile buffer. GLO survey maps show the Project Area as an open grassland perforated by small watercourses and wetlands. Review of the Illustrated Historical Atlas of Minnesota (Andreas 1874) found several structures including schools, rural residences, and public buildings located within the Project Area and the one-mile buffer.

Atwell reviewed the 1914 historic atlas for Dodge County (The Farmer Magazine 1914a) and determined that the Project Area was entirely agricultural fields with a sparse scattering of single-family farmhouses, schools, and public buildings. Atwell reviewed the 1896 Standard Atlas of Mower County and observed an unnamed school in the same township/range/section as the Evanger church and cemetery (Geo A. Ogle & Co. 1896). The school appears in online plat maps up to 1925 and then disappears from maps; the school's mapped location falls within the one-mile buffer of the Project Area. One additional church was identified within the 1-mile buffer, however the church is not named. Atwell also reviewed the 1915 and 1925 editions of the Plat Book of Mower County Minnesota, however no additional potential cultural resources were identified (Anon 1915; W. W. Hixon & Co. 1925).

U.S. Geological Survey (USGS) topographic maps ranging in date from 1954 to 1958 (ESRI 2020) indicate the area surrounding the Project Area and one-mile buffer was sparsely populated with a typical grid system of roads and property lines. Most of the properties in the Project Area consist of single-family farmhouses, their related agricultural fields, and outbuildings. Cemeteries are not mapped within the Project Area, but the Fairview Cemetery is depicted on USGS topographic maps within the one-mile buffer.

3.2 PREVIOUS CULTURAL RESOURCES SURVEYS

Atwell's review found no previously conducted surveys on file with the MnSHPO or OSA that are located within the Project Area or within the Project's one-mile buffer. However, Atwell previously conducted a Phase I archaeological survey for the proposed Project in 2018. Atwell's 2018 investigation (Pfennig and Kotwasinski 2018) documented three newly recorded archaeological sites (21DO0017, 21DO0018, and 21DO0019), which were recommended not eligible for listing in the NRHP. The report was provided to the MnSHPO for review and comment on August 8, 2018, and concurrence on the findings was received from MnSHPO on September 12, 2018. The current proposed route places the three sites outside of the Project Area and one-mile buffer.

3.3 ARCHITECTURAL RESOURCES

The MnSHPO records identified two architectural resources within the Project Area and an additional 22 architectural resources within the one-mile buffer, for a total of 24 documented resources (**Table 2**). Within the Project Area, Minnesota State Highway 56 (XX-ROD-022) intersects the Project running north and south. Trunk Highway 43 (XX-ROD-027) crosses the Project running east and west, passing through the town of Hayfield. These resources have not been professionally evaluated to determine their eligibility for inclusion in the NRHP.

Table 2. Previously Recorded Architectural Resources Within the Project and One-Mile Buffer

Inventory Number	Property Name	County	Relation to Project	NRHP Eligibility
XX-ROD-022	Trunk Hwy 56 (south extent)	Dodge	Crosses Project	Unevaluated
XX-ROD-027	Trunk Hwy 30	Dodge	Crosses Project	Unevaluated
MW-PLE-003/MW-SNT-005	Austin & LaCrosse Road Section	Mower	In One-mile buffer	Unevaluated
MW-SNT-003	Zion Lutheran Church	Mower	In One-mile buffer	Unevaluated
MW-SNT-006	Bridge No. 2493	Mower	In One-mile buffer	Unevaluated
DO-HFC-001	Hayfield Lumber Company Buildings	Dodge	In One-mile buffer	Unevaluated
DO-HFC-002	Railroad Trackside Buildings	Dodge	In One-mile buffer	Unevaluated
DO-HFC-003	Reese Farm Center Complex	Dodge	In One-mile buffer	Unevaluated
DO-HFC-004	school	Dodge	In One-mile buffer	Unevaluated
DO-HFC-005	Farmers Co-op Oil Association Service Station	Dodge	In One-mile buffer	Unevaluated

Inventory Number	Property Name	County	Relation to Project	NRHP Eligibility
DO-HFC-006	house	Dodge	In One-mile buffer	Unevaluated
DO-HFC-007	Hayfield Township Hall	Dodge	In One-mile buffer	Unevaluated
DO-HFC-008	Elevated Water Tank	Dodge	In One-mile buffer	Unevaluated
DO-HFC-009	Hayfield Window Company	Dodge	In One-mile buffer	Unevaluated
DO-HFC-010	First Presbyterian Church	Dodge	In One-mile buffer	Unevaluated
DO-HFC-011	city hall	Dodge	In One-mile buffer	Unevaluated
DO-HFC-012	bank	Dodge	In One-mile buffer	Unevaluated
DO-HFC-013	Trinity Lutheran Church	Dodge	In One-mile buffer	Unevaluated
DO-HFT-001	Fairview Cemetery Gate	Dodge	In One-mile buffer	Unevaluated
MW-SAR-001	general store (razed)	Mower	In One-mile buffer	Unevaluated
MW-SAR-002	fire department	Mower	In One-mile buffer	Unevaluated
MW-SNT-008	Bridge 1725	Mower	In One-mile buffer	Unevaluated
MW-WAL-001	school	Mower	In One-mile buffer	Unevaluated
MW-WAL-002	house	Mower	In One-mile buffer	Unevaluated

Review of architectural resources under the Minnesota Historic Sites Act would typically only include NRHP, MSHSN, or MSRHP designated or listed resources. Architectural resources listed on the NRHP, MSHSN, or MSRHP are not present within the Project Area or within the one-mile buffer. Architectural resources that have not been designated or listed on the NRHP, MSHSN, or MSRHP (resources that are unevaluated or eligible) would not require additional architectural evaluation or avoidance by the Project.

3.4 ARCHAEOLOGICAL RESOURCES

The literature search identified no archaeological sites in the Project Area. Two archaeological sites have been recorded within the one-mile buffer. Site 21MW0063 is referenced in OSA records as an isolated broken biface made from Swan River Chert. The site was discovered in a plowed agricultural field approximately 0.85 miles from the Project Area during a pedestrian survey in 2008. Site 21DO0023 is a small find of two, non-diagnostic ground stone tools. The site was identified approximately 0.6 miles from the Project Area during the cultural resources

investigation of the proposed Dodge County Wind Project. Both sites, 21MW0063 and 21DO0023, were recommended not eligible for NRHP inclusion.

4 CONCLUSIONS AND RECOMMENDATIONS

Atwell conducted a literature search of the Project Area and one-mile buffer. Based on the results of this review, very few cultural resources are known to be present within the Project Area. Atwell recommends the following:

- Per the Minnesota Historic Sites Act, only architectural resources designated or listed on the NRHP, MSHSN, and MSRHP would require avoidance by the Project. None of the architectural resources identified within the Project Area or one-mile buffer are listed on the NRHP, MSHSN, and MSRHP. Architectural resources within the Project Area or one-mile buffer that are unevaluated for listing on the NRHP, MSHSN, or MSRHP would not require avoidance or further evaluation for Minnesota Historical Society review under the Minnesota Historic Sites Act. Nevertheless, DCW has voluntarily avoided direct impacts to all recorded architectural resources within the Project Area. Therefore, no additional architectural investigation is recommended.
- No known archaeological sites are recorded within the Project Area. Two archaeological sites have been recorded within the one-mile buffer. Site 21MW0063 is an isolated occurrence, and site 21DO0023 is a small prehistoric find comprised of two, non-diagnostic ground stone tools. Both 21MW0063 and 21DO0023 have been previously recommended not eligible for NRHP inclusion.
- No cemeteries are located within the Project Area. The Fairview Cemetery is depicted on USGS topographic maps in the one-mile buffer. As currently proposed, the Project will not impact any cemeteries or burial grounds, thus avoiding potential violations of Minnesota Statute 307.08, which protects private cemeteries and burial grounds.
- The majority of the proposed Project has not been previously subjected to archaeological survey. Once the Project has been fully sited, the MnSHPO may request additional archaeological survey of ground disturbance locations that have not been surveyed. A qualified archaeologist would conduct the archaeological survey to identify any unrecorded archaeological sites that could possibly be present in these locations. The exact nature of additional archaeological survey would be determined through coordination with the OSA and MnSHPO.

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FIGURES

Dodge County Wind, LLC

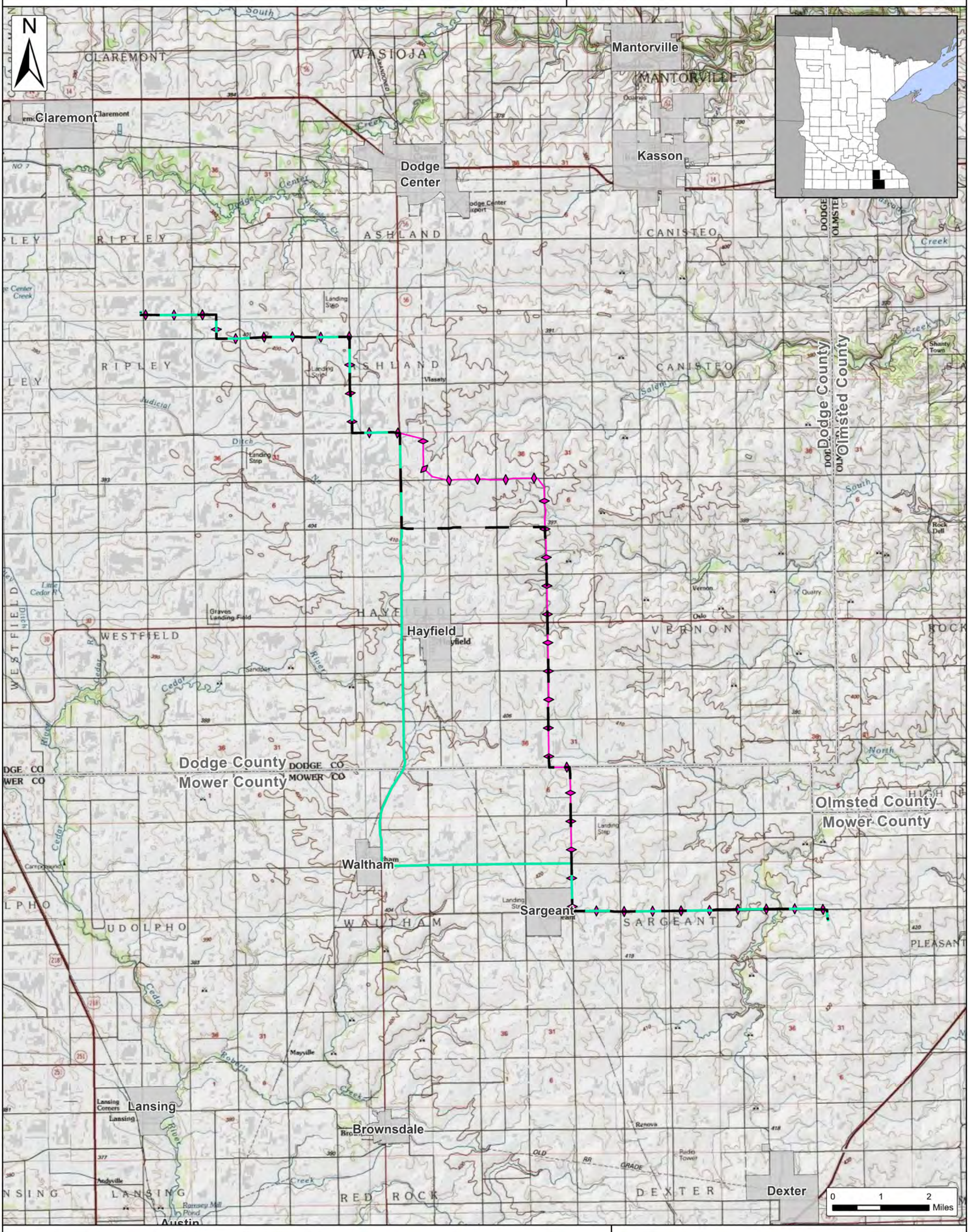
Figure 1. Project Location Map

Dodge County and Mower County, Minnesota

Client:
Dodge County Wind, LLC

Issue Date:
10/16/2023

Atwell, LLC Project:
16002517



Project Area

- Route A
- Route B
- Route C

- City/Village
- Townships
- Counties

SOURCE: USGS TOPOGRAPHIC QUADRANGLES 1:24,000

ATWELL

Dodge County Wind, LLC

Figure 2. Previously Recorded Cultural Resources

Dodge County and Mower County, Minnesota

Client: Dodge County Wind, LLC

Issue Date: 10/16/2023

Atwell, LLC Project: 16002517