

Appendix G - **CULTURAL RESOURCE REPORT**

September 24, 2025

RE: Phase I Archeological Survey for the Proposed Sherco South & West Battery Energy Storage System Project in Becker, Minnesota

This report describes the results of a Phase I archaeological survey for the Sherco South & West Battery Energy Storage System Project in Becker, Minnesota (Attachment A: Figure A-1). Xcel Energy (Xcel) retained Burns and McDonnell Engineering Company, Inc. (Burns & McDonnell) to conduct a Phase I archaeological survey to identify archaeological resources within the approximately 64 acres Project boundary (Project area). This report was completed as part of due diligence associated with the Project's approval from the Minnesota Public Utilities Commission via a Site Permit.

All archaeological survey work met the standards set by the Minnesota Office of State Archaeology (MN OSA) and the Minnesota state historic preservation office (SHPO) and/or Section 106 of the National Historic Preservation Act (NHPA).

Introduction

Xcel is proposing construction of the Project area in Sherburne County, approximately 2 miles southwest of downtown Becker, Minnesota (Attachment A: Figure A-1). The Project will be located immediately south of the existing Sherco Power Plant, owned and operated by Xcel. Currently, the Project is located within mostly undeveloped wood and scrub consisting of some areas of pine and mixed vegetation. Some areas of open pasture are present. Two modern barns and associated outbuildings and a road area are located in the central portion of the Project area. The Project area is positioned on an upper terrace overlooking the Mississippi River, which is 200 meters to the south.

The Project will consist of a battery energy storage system with a nominal power rating of up to 600 megawatts alternating current with approximately 2,400 megawatt-hours of energy capacity. In addition to battery energy storage units, the Project will consist of inverters and electrical feeder lines, a gen-tie transmission line, switchyard and substation, storage and parking areas, access roads, fencing, and other minor equipment and appurtenant components typical of a battery energy storage system project.

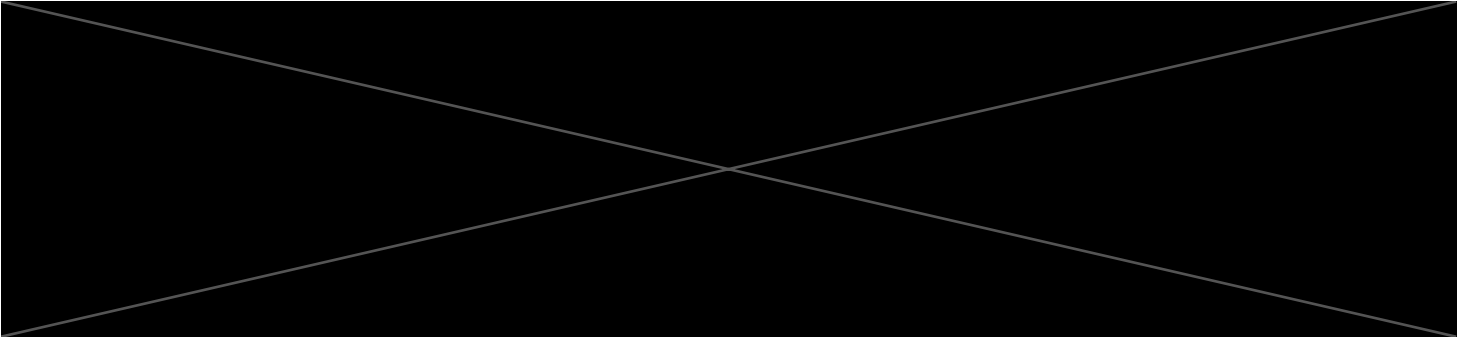
Desktop Review: Methods

In May 2025, Burns & McDonnell archaeologist reviewed archaeological and historical literature relevant to the Project area and a surrounding 1-mile area (Study area). Records maintained through the MN OSA online portal was the primary source of data. The review of MN OSA public and archaeological online portal included archaeological site inventory records, listings and locations of historic structures, cemeteries, and National Register of Historic Places (NRHP) properties and districts. Additional information was obtained from historic-era maps including 1957, 1984, 1991, and 2003 historic aerials, and 1953, 1955, 1961, 1975, 1985, and 1991 historic topographic maps. These historic maps provide approximate location information for structures such as houses, outbuildings, churches, schools, and cemeteries which may be nonextant or unmarked in the present day. A review of the historic-age photographs and maps, it appears that the area was utilized as agricultural land until sometime before 1984, likely correlating with construction of Sherco Power Plant Unit 3. The 1984 aerial image shows a large facility in the central and east side of the Project area and the 1991 aerial indicates further development. Between 2003 and 2008, the large facility in the center of the Project area had largely been demolished, allowing for trees and scrub to reassert itself. A small portion of the western end of the Project area does not appear to have been impacted by development, although it was under cultivation before 1984.

Desktop Review: Results

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FIELD SURVEY: METHODS

Various field methods can be utilized to identify archaeological resources and to obtain data needed to identify age, function, and other characteristics of each site investigated. Pedestrian survey and systematic shovel testing at 30-meter intervals were selected based on the research design, environmental conditions, and the scope of work required by the Project.

The examination included visual inspection of the ground surface, any visible cut banks, animal burrows, trails, and borrow pits. Slopes greater than 15 percent were not shovel tested. Only areas that did not appear that been previously disturbed were shovel tested. All other areas of the Project were surveyed via pedestrian survey. This approach helped determine the presence or absence of archaeological resources and provided the investigators insight into the environmental characteristics of the Project.

FIELD SURVEY: RESULTS

Archaeological field survey was completed on June 10, 2025, by Burns & McDonnell archaeologists Douglas Shaver. In general, the Project area is lightly wooded with ground surface visibility ranging from 10 to 50 percent. There were also patches of upland hardwoods, pines, mixed grasses, and scrubs. A total of 29 shovel tests were excavated within the Project area (Attachment A: Figure A-3) in western areas that do not appear to have been heavily disturbed. The eastern portion of the Project area will be for temporary only use and ground disturbance is expected to be minimized. All shovel tests excavated were negative for cultural material. Data forms for shovel tests are available upon request.

SUMMARY

The primary objectives of the archaeological survey for the Project were (1) to identify existing cultural resources or areas with the potential for archaeological resources, and (2) to provide recommendations for avoidance or minimization of impacts on archaeological resources, if extant.

No previously recorded archaeological sites are located within the Project area. No new archaeological sites, artifacts, features, or cultural materials were identified within Project area.

Although state and Federal review of historic resources is not currently required for the Project, if permitting ultimately requires such consultation, the NRHP eligibility of all recorded resources and the Project's potential to adversely affect historic (NRHP-listed or eligible) properties would require agency review and concurrence.

If you have any questions or require additional information, please feel free to contact me by telephone at (314) 391-5332 or by e-mail at deshaver@burnsmcd.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Douglas Shaver".

Douglas Shaver, M.S., R.P.A.
Senior Cultural Resources Specialist, Principal Investigator

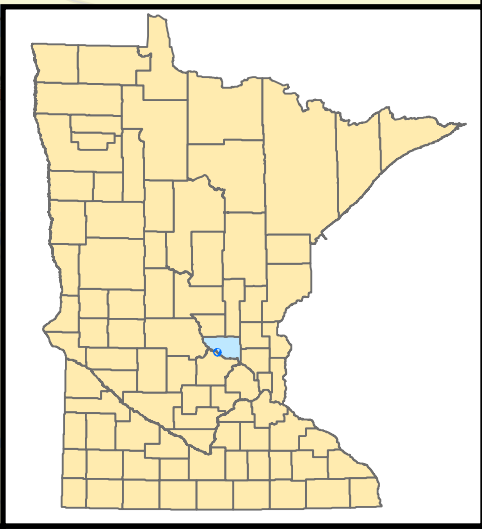
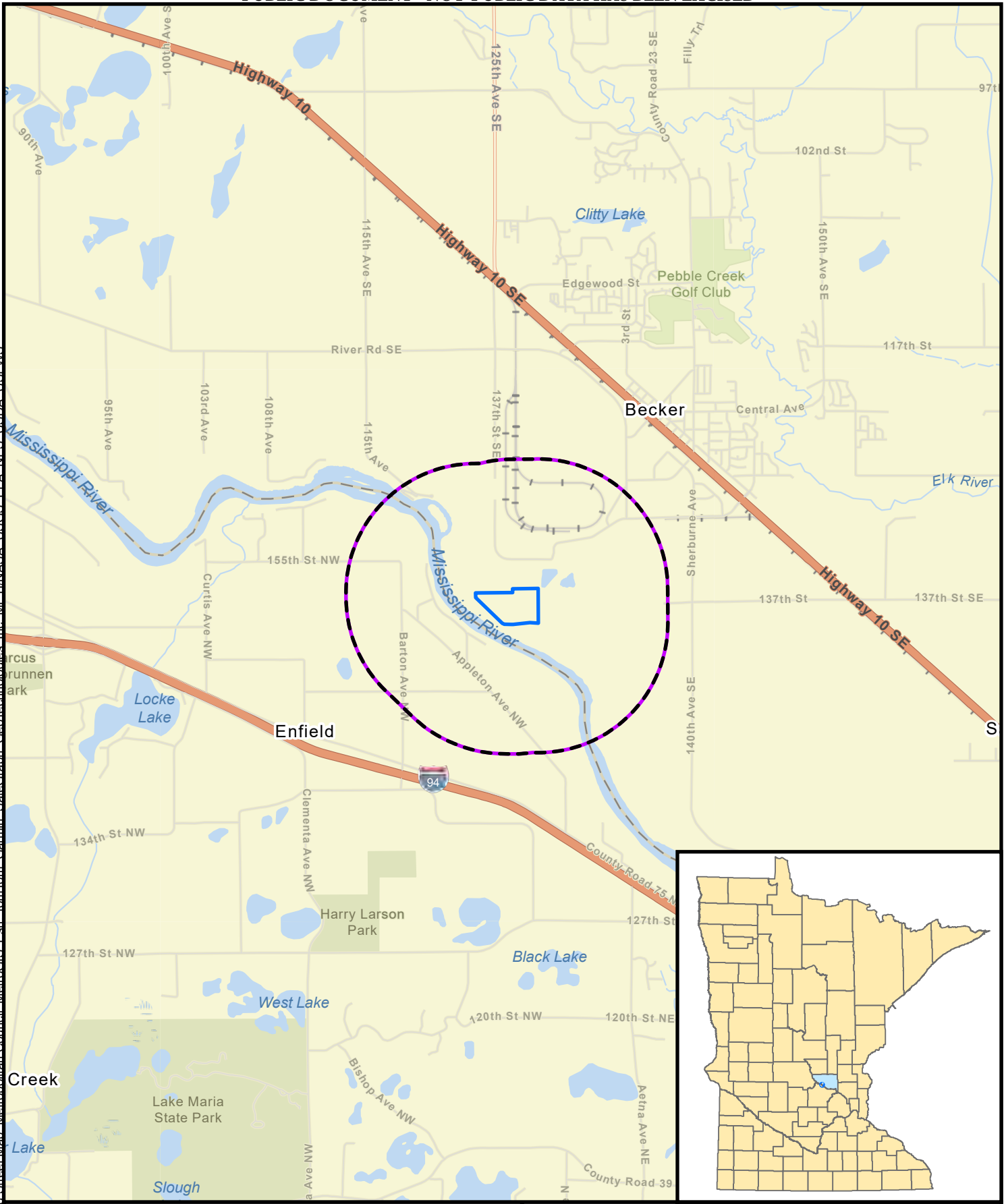
Attachments:



Attachment A – Map Figures



Attachment A - FIGURES

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-  Study Area
-  Project Area

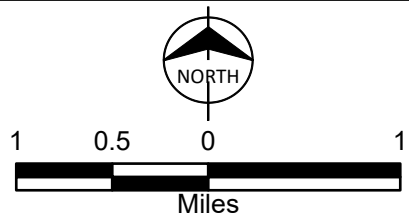
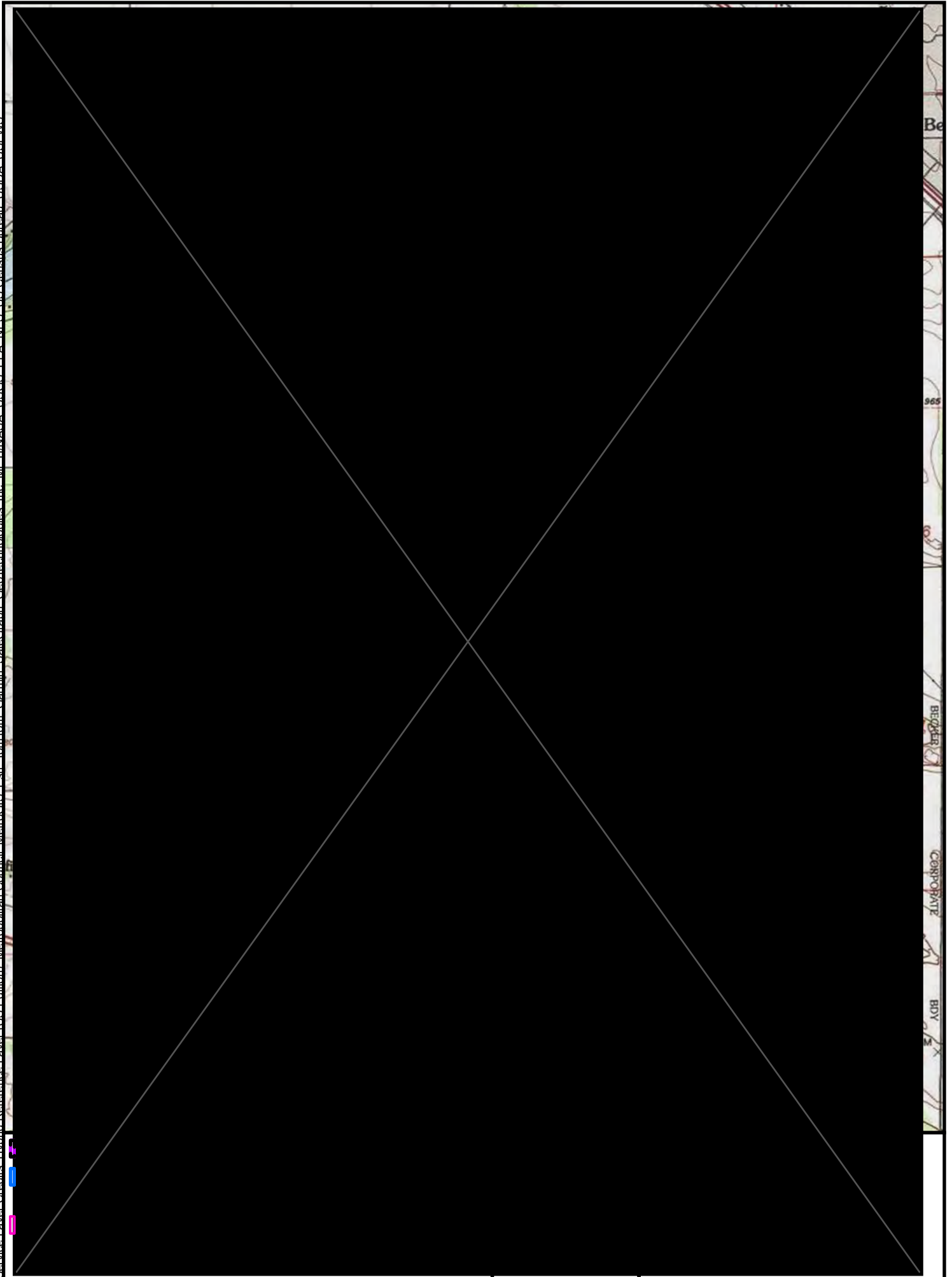


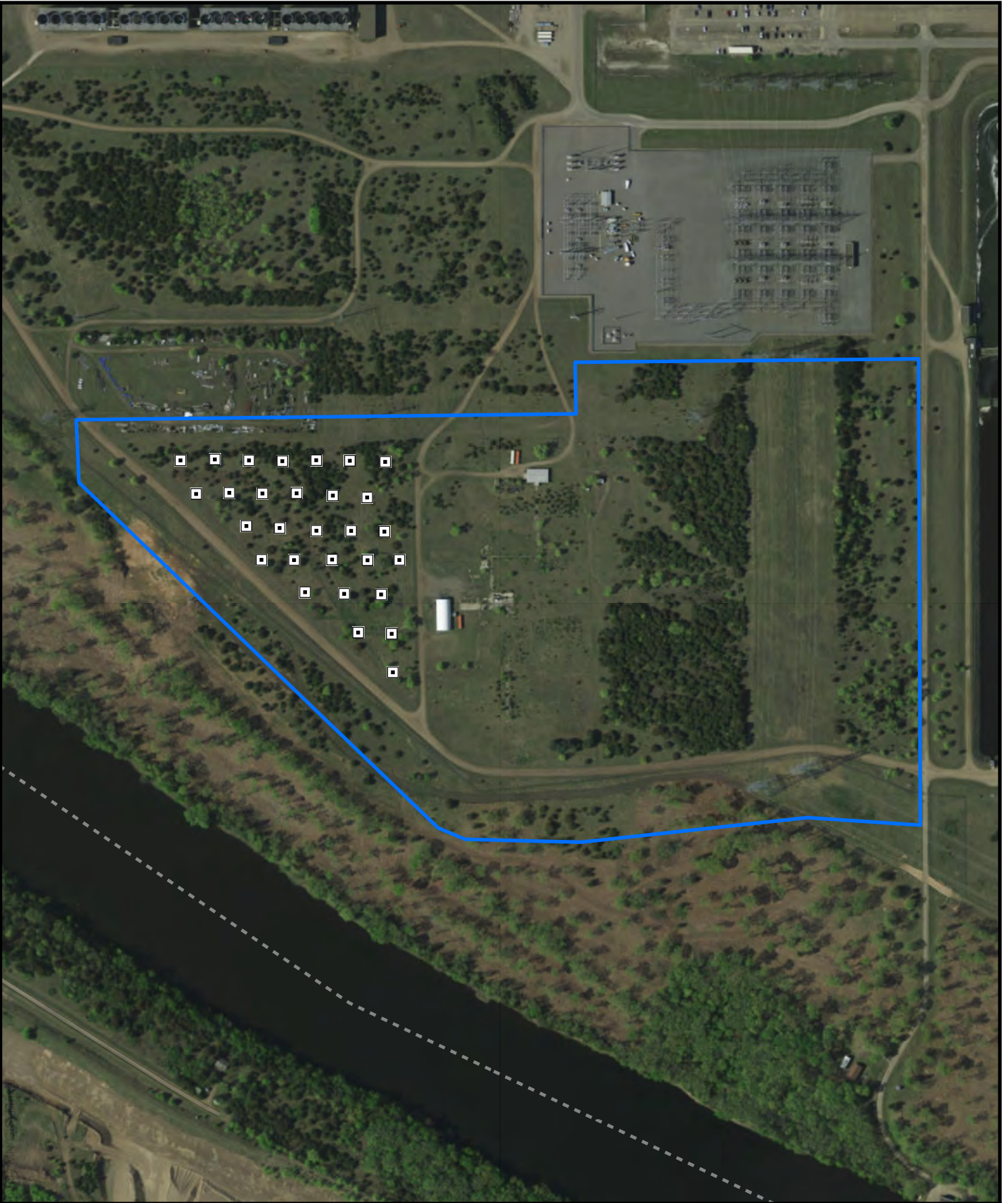
Figure 1
 General Project Location
 SHERCO BESS
 South/West Project
 Sherburne County, Minnesota

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<ul style="list-style-type: none"> Project Area Negative Shovel Test 	<p>NORTH</p> <p>120 60 0 120</p> <p>Meters</p>	<p>BURNS MCDONNELL</p>	<p>Figure 3 Field Survey Results SHERCO BESS South/West Project Sherburne County, Minnesota</p>
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November 14, 2025

VIA EMAIL ONLY

Tyler Beemer
Siting and Land Rights Agent
Burns & McDonnell
tbeemer@burnsmcd.com

RE: Sherco South and Sherco West Energy Storage Project
T33 R29 S1, 2, 11, & 12
Becker, Sherburne County
SHPO Number: 2026-0061

Dear Tyler Beemer:

Thank you for the opportunity to comment on the above referenced project. We understand that this project will require a Minnesota Public Utilities Commission site permit. Therefore, the submitted information has been reviewed pursuant to the responsibilities given the State Historic Preservation Office by the Minnesota Historic Sites Act (138.665-666). If this project will be located on non-federal public land, the project will also be subject to review under the Minnesota Field Archaeology Act (138.40).

Based on the October 27th submittal, the proposed project is a battery energy storage system proposed in approximately 64 acres near the Sherco Power Plant in Becker. The project includes demolition, clearing, tree removals, grading, and the construction of the energy storage system, a substation, roads, and facilities.

We have reviewed the report *Phase I Archeological Survey for the Proposed Sherco South & West Battery Energy Storage System Project in Becker, Minnesota* prepared by Burns & McDonnell in September 2025 and agree that there are **no significant archaeological sites** within the survey area. Additionally, there are **no properties** listed in the National or State Registers of Historic Places, or within the Historic Sites Network, that will be affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency in order to define an appropriate area of potential effects for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Lucy Harrington, Environmental Review Archaeologist, at (651)201-3283 or lucy.harrington@state.mn.us.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Amy Spong'.

Amy Spong
Deputy State Historic Preservation Officer

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnsppo@state.mn.us

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