

July 29, 2025

Environmental Review Program Manager
State Historic Preservation Office
Administration Building Suite 203
50 Sherburne Ave
St. Paul, MN 55155

Re: Lemon Hill Solar, LLC
Lemon Hill Solar Project, Olmsted County, MN
Phase I Archaeological Survey Addendum 1 Report
SHPO Project Number 2024-1718

Dear Environmental Review Program Manager:

Lemon Hill Solar, LLC (Lemon Hill Solar) is planning to build a new utility-scale solar facility known as the Lemon Hill Solar Project (Project). The proposed Project site is located east of the City of Rochester in Olmsted County, Minnesota. Merjent, Inc. (Merjent) completed a survey of the initial Project footprint on November 2, 2024. A report titled *Phase I Archaeological Survey Report for the Lemon Hill Solar Project, Olmsted County, Minnesota* (Amstrong-Duarte and Mieras 2024) was submitted to the Minnesota State Historic Preservation Office (SHPO) in January 2025 (SHPO Project Number 2024-1718). In a letter dated March 3, 2025, the SHPO concurred with Merjent's assessment that, "no significant archaeological sites will be affected by the Project and that 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 the Project."

In April 2025, several Project areas were surveyed that were not surveyed during the initial survey effort (referred to as Areas 1 to 6 or April 2025 Survey Areas), see Figure 1 attached. The total acreage of the April 2025 Survey Areas is 128.22 acres; locations and acreages of these areas are provided in the table below. This letter presents the results and recommendations of the additional Phase I archaeological survey completed for the Project.

April 2025 Survey Areas					
Location	Description	Township	Range	Section(s)	Acres
Area 1	Parcel: Southwest corner of the intersection of 70th Avenue NE and 65th Street NE	107N	13W	11	76.24
Area 2	Collector Line: Adjacent to and west of 70th Avenue NE	107N	13W	11, 14	1.80
Area 3	Road Access: Southwest corner of the intersection of 70th Avenue NE and Viola Road NE (Co. Rd. 2 NE)	107N	13W	23	0.04
Area 4	Road Access: Northeast corner of the intersection of County Road 24 NE and 48th Street NE	107N	12W	18	0.05
Area 5	Collector Line: Adjacent to and west of County Road 102 NE	107N	12W	19	0.42
Area 6	Parcel: Northwest of the corner of 100th Avenue NE and Silver Creek Road NE	107N	12W	29	49.67
TOTAL					128.22

Regulatory

The Project will require a Site Permit from the Minnesota Public Utilities Commission (PUC) pursuant to the Minnesota Power Plant Siting Act (Minnesota Statutes Chapter 216I) and Minnesota Administrative Rules Chapter 7850. The PUC requires consideration of Project impacts to cultural and historical resources by following relevant state historic preservation laws, notably the Field Archaeology Act (MS 138.31-42) and the Private Cemeteries Act (MS 307.08). Therefore, Merjent, as Lemon Hill Solar's environmental consultant, is submitting the Project's Phase I archaeological survey report and recommendations to the SHPO for review. Construction will not begin until all permits and clearances have been received.

Additional Survey

The April 2025 Survey Areas consist of discontinuous parcels set in a rural landscape and are composed largely of agricultural fields, road and utilities rights-of-way, and road borrows.

Background Reviews

In March and April 2025, Merjent updated the literature review of cultural resources within a 1.0-mile buffer (Study Area) of the April 2025 Survey Areas. There were no additional State or National Register of Historic Places (NRHP) listed or eligible resources identified within the Study Area.

Phase I Survey

Merjent, on behalf of Lemon Hill Solar, conducted a Phase I archaeological field survey of the April 2025 Survey Areas on April 17, 2025. The archaeological survey followed the survey methods described in the previously approved Phase I Survey Plan and Methods for the Project. A total of 80.6 acres, which represents 100 percent of the high and medium probability areas and at least 5 percent of the low probability areas, were surveyed by Merjent.

During the Phase I archaeological survey, two precontact archaeological sites (21OL0078 and 21OL0079), each consisting of a precontact single chert tertiary flake, were identified. Intensive pedestrian survey and shovel testing around the site locales did not result in the discovery of additional cultural material. Merjent recommends that the sites are not eligible for listing in the NRHP.

Conclusion and Request for Comment

Based on the Phase I archaeological survey conducted in April 2025, Merjent recommends that:

- 1) archaeological site numbers 21OL0078 and 21OL0079 do not meet the NRHP criteria and are therefore not eligible for listing on the NRHP;
- 2) no historic properties will be affected by the Project as proposed; and
- 3) no further archaeological work is recommended for the Project as planned.

Merjent, on behalf of Lemon Hill Solar, requests your review and comment on the *Phase I Archaeological Survey Report for the Lemon Hill Solar Project, Addendum 1* and Merjent's recommendations. Lemon Hill Solar and Merjent look forward to receiving your comments. If you have any questions regarding the information in this submission, please contact me at 612.245.7639, or via email at aaron.armstrong-duarte@merjent.com or contact Dan Flo, Merjent's Project Manager, at 612.812.0069, or via email at dan.flo@merjent.com.

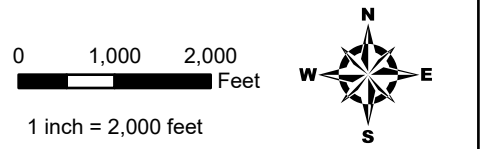
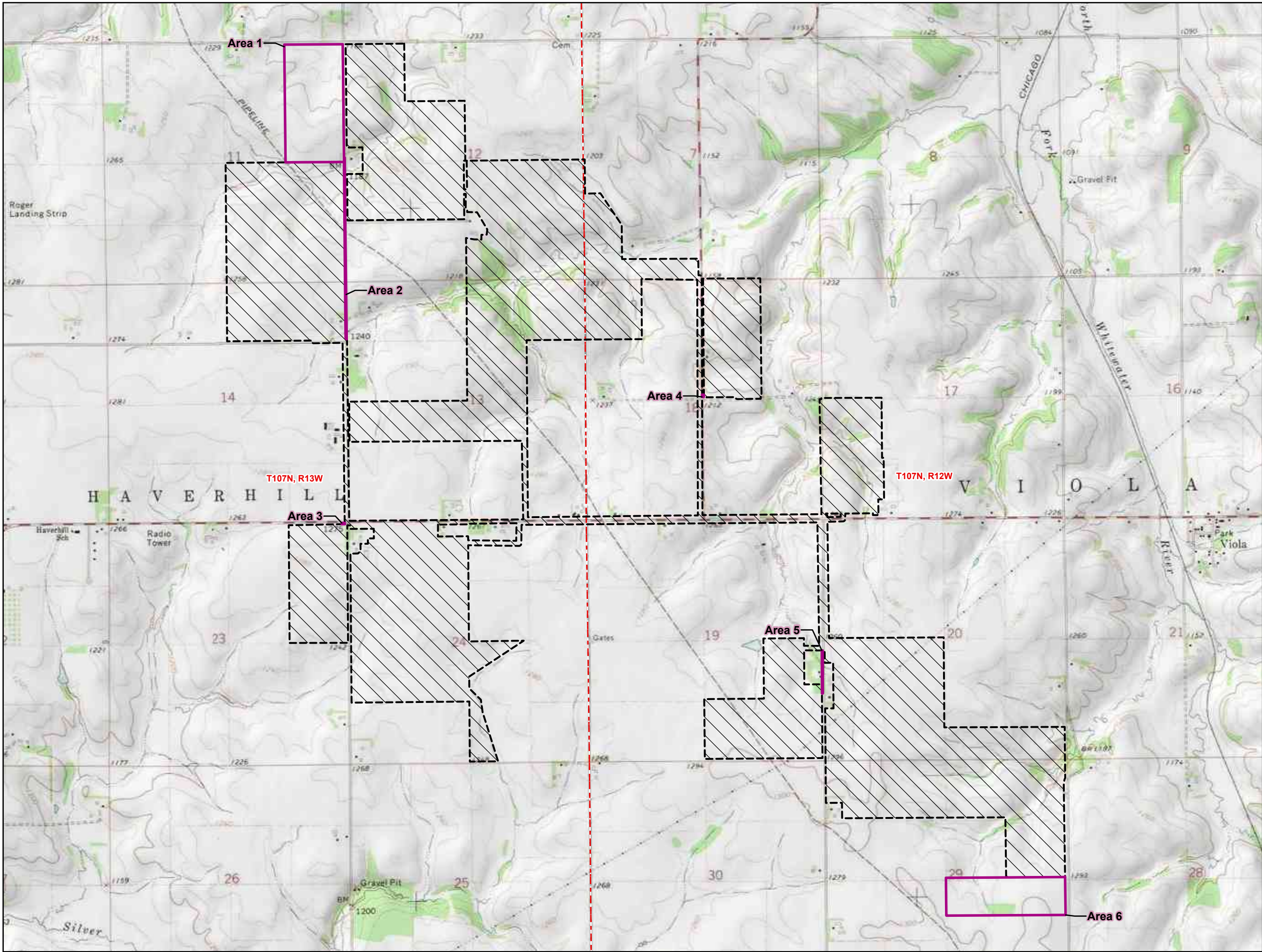
Sincerely,
Merjent, Inc.

A handwritten signature in blue ink, appearing to read 'A. Duarte', followed by a long horizontal line.

Aaron Armstrong-Duarte, PhD
Archaeology Principal Investigator

CC: Zane Jones, Lemon Hill Solar: zane@rangerpower.com
Dan Flo, Merjent: dan.flo@merjent.com

Attachments: Figure 1 – Project Map
Phase I Archaeological Survey Report for the Lemon Hill Solar Project, Addendum 1
Request for Project Review by the SHPO Form



- 2025 Project Area (Addendum Survey)
- 2024 Project Area (Previously Surveyed)
- Township Boundary

Figure 1:
Project Location
Lemon Hill Solar, LLC
Lemon Hill Solar Project
Olmsted County, Minnesota

