

June 24, 2022

Ken Young
Apex Clean Energy
120 Garrett St, Suite 700
Charlottesville, VA 22902

RE: Big Bend Wind Project, Big Bend Transmission Line, and Red Rock Solar Project
Cottonwood, Jackson, Martin, and Watonwan Counties
SHPO Numbers: 2018-0592 and 2021-0387

Dear Mr. Young,

Thank you for continuing consultation on the above referenced projects. Information received in May 2022 has been reviewed pursuant to the Minnesota Historic Sites Act (Minn. Stat. 138.665-666).

According to your correspondence, Apex Clean Energy (Apex) is proposing to construct the Big Bend Wind Project (Wind Project), the Red Rock Solar Project (Solar Project), and an associated Transmission Line within Cottonwood, Martin, and Watonwan Counties in Minnesota. Together, the Wind Project and Solar Project represents Minnesota's first potential wind-solar hybrid renewable energy project. If the Solar Project is constructed, it would be constructed within the proposed Wind Project site boundaries, and the overall size of the Wind Project would decrease. Apex is not proposing the Solar Project independent of the Wind Project, although the Wind Project may proceed without the Solar Project. The Transmission Line would be required for any configuration of the Projects (wind/solar or wind-only).

As you know, our office has been in ongoing consultation with Apex, the Lower Sioux Indian Community, the Upper Sioux Community, the Minnesota Historical Society, and other consulting parties regarding these projects and has participated in several meetings to discuss the projects relative to their impacts on cultural resources, most notably the Jeffers Petroglyphs Site in Cottonwood County which is listed in both the State and National Registers of Historic Places.

We have completed our review of the following documentation that was submitted in May 2022:

- Big Bend Wind and Red Rock Solar cover letter (Apex Clean Energy, April 28, 2022);
- *Settlement Agreement* among Big Bend Wind, Red Rock Solar, Apex Clean Energy Holdings, the Minnesota Historical Society, the Lower Sioux Indian Community, and the Upper Sioux Community (September 2021);
- Report titled *Historic Architecture Inventory of the Big Bend Wind Project, Cottonwood and Watonwan Counties, Minnesota* (Quality Services, April 28, 2022);
- Report titled *Phase I Cultural Resources Reconnaissance Survey of the Big Bend Wind Project, Cottonwood and Watonwan Counties, Minnesota* (Quality Services, April 10, 2022);
- Report titled *Historic Architecture Inventory of the Big Bend Transmission Line, Cottonwood, Jackson, Martin, and Watonwan Counties, Minnesota* (Quality Services, April 6, 2022);
- Report titled *Phase I Cultural Resources Reconnaissance Survey of the Big Bend Transmission Line, Cottonwood, Martin, and Watonwan Counties, Minnesota* (Quality Services, February 24, 2022);
- Report titled *Historic Architecture Inventory of the Red Rock Solar Energy Project, Cottonwood and Watonwan Counties, Minnesota* (Quality Services, January 26, 2022);
- Report titled *Phase I Cultural Resources Inventory of the Red Rock Solar Energy Project, Cottonwood County, Minnesota* (Quality Services October 26, 2020); and
- Associated Inventory Forms

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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Our comments are provided below.

History-Architecture Designated Properties

Big Bend Wind Project

For purposes of our review pursuant to state statutes, the direct Area of Potential Effect (APE) defined for the Big Bend Wind Project consists of all areas of potential ground disturbance related to the construction of the proposed Wind Project. The indirect APE for the Wind Project has been defined as 1.5 miles from the proposed turbines and other Wind Project infrastructure, where indirect impacts such as visual and/or auditory impacts, may occur. Although your letter indicates that there is one State Register listed history-architecture property located within the indirect APE, Heritage House (CO-MLC-077), according to Minn. Stat. 138.664 "Historic Places" this property is not listed in the State Register. (See <https://www.revisor.mn.gov/statutes/2020/cite/138.664> for reference). Therefore, based on information that is available to us at this time, we have determined that besides the Jeffers Petroglyphs Site, which is discussed below, there are no other National Register listed or State Register listed history-architecture properties that will be affected by the Big Bend Wind Project.

Big Bend Transmission Line

For purposes of our review pursuant to state statutes, the direct Area of Potential Effect (APE) defined for the Big Bend Transmission Line Project consists of all areas of potential ground disturbance related to the construction of the proposed transmission line. The indirect APE for the Transmission Line Project was defined as 1 mile from the proposed transmission line, where indirect impacts such as visual and/or auditory impacts, may occur. Based on information that is available to us at this time, we have determined that there are no National Register listed or State Register listed history-architecture properties that will be affected by the Big Bend Transmission Line Project.

Red Rod Solar Project

For purposes of our review pursuant to state statutes, the direct Area of Potential Effect (APE) defined for the Red Rock Solar Project consists of all areas of potential ground disturbance related to the construction of the proposed Solar Project. The indirect APE was defined as 1 mile from the proposed Solar Project, where indirect impacts such as visual and/or auditory impacts, may occur. Based on information that is available to us at this time, we have determined that there are no National Register listed or State Register listed history-architecture properties that will be affected by the Red Rock Solar Project.

We appreciate receiving the history-architecture property inventory forms that were prepared as part of the field survey for these projects. This information will be incorporated into our statewide inventory databases and files.

Archaeological Resources

Red Rock Solar Project

Based on the information provided, we agree that no archaeological resources will be affected by the Red Rock Solar Project.

Big Bend Transmission Line Project

Based on the information provided, we agree that no significant archaeological resources will be affected by the Big Bend Transmission Line Project provided that archaeological site **21CO0095** is protected and avoided. If it is not feasible to avoid impacts to site 21CO0095, then additional Phase II evaluation will be needed to determine its eligibility for listing in the National Register of Historic Places.

Big Bend Wind Project

Although we agree that no archaeological resources will be directly affected (e.g. ground disturbance due to construction) by the Big Bend Wind Project, the most difficult aspect of the review for this project has been the proposed proximity of wind turbines to the **Jeffers Petroglyphs Site (21CO0003)**, which is listed in the National Register of Historic Places and is under consideration for designation as a National Historic Landmark. This property is also a designated historic property as it is part of the Historic Sites Network (Minn. Stat. 138.661-662).

In our opinion, the revised Wind Project design has lessened the anticipated visual impacts to the viewshed and setting of Jeffers Petroglyphs and is an improvement over the original design. We respect the September 2021 Settlement Agreement signed by the Lower Sioux Indian Community, the Upper Sioux Community, and the Minnesota Historical Society and therefore will agree that the currently proposed configuration of turbines is acceptable.

However, in our opinion, it is not accurate to state that the project “will not have an effect on cultural resources.” The potential adverse impacts/effects have been minimized by the current design, but, in our opinion, there would be no adverse effect on the historic character and physical features of the historic property only if no wind turbines were visible from the Jeffers Petroglyphs Site or other significant cultural sites on Red Rock Ridge. Any future wind development proposals should be reviewed through appropriate consultation with tribal nations and other consulting parties based on historical designations and the cultural context of Red Rock Ridge as understood at that time, without regard to the configuration of the turbine layout agreed to in the current proposal.

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. 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 me at (651) 201-3290 or sarah.beimers@state.mn.us.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

cc: Kent Whitworth, Director, Minnesota Historical Society
David Briesse, Site Manager, Jeffers Petroglyphs
Cheyenne St. John, THPO, Lower Sioux Indian Community
Samantha Odegard, THPO, Upper Sioux Community
Melissa Cerda, Minnesota Indian Affairs Council
Amanda Gronhovd, Minnesota Office of the State Archaeologist