

Appendix I-1 – Cultural Resources Literature Review

October 12, 2021

Mark D. Crowl
Manager, Renewable Development
Lake Wilson Solar Energy LLC
One South Wacker Drive, Suite 1800
Chicago, IL 60606

**Re: Phase Ia Cultural Resources Literature Review for the Lake Wilson Solar Project, Murray County, Minnesota
File R0012861.01**

Dear Mr. Crowl:

Westwood Professional Services, Inc., (Westwood) was contracted by Lake Wilson Solar Energy LLC to conduct a Phase Ia cultural resources literature review for the proposed Lake Wilson Solar Project (Project). The cultural review will assist with Project design, as well as support anticipated permitting of the approximately 150 megawatt (MW) solar energy generation facilities, a 50 MW battery storage facility, and related facilities. The literature review examined documentary resources, including historic maps, archaeological site files, historic structure inventories, and previous cultural resource survey reports.

The Project Area is approximately 3,318 acres in Murray County, Minnesota (see attached **Exhibit 1**). Approximately 18,451.32 acres were reviewed as part of the literature review study area, including a one-mile buffer from the Project Area (**Table 1** and **Exhibit 1**).

Table 1: Sections Containing Project Area and/or One-Mile Buffer

Township	Range	Sections Containing Project Area	Sections Containing Buffer
106	42	15-17, 19-22, 27, 30	7-11, 14, 15, 17-23, 26-35
106	43	13, 24	11-14, 23-26, 36

On September 15 and 16, 2021, Westwood Cultural Resources Manager Ryan Grohnke examined files maintained by the Office of the State Archaeologist (OSA) and the Minnesota State Historic Preservation Office (SHPO). Review of information from these offices included an examination of site maps, archaeological site forms, burial files, historic structure inventories, and survey reports. The purpose of this review was to create an inventory of previously recorded cultural resources, including archaeological sites and historic architectural resources in the study area. The background research and literature review would identify previous cultural resource investigations along with levels of disturbance and potential for sites within the Project Area or buffer. The review also

included an examination of the National Register of Historic Places (NRHP) dataset, aerial photography, and historic mapping.

Due to precautions required by the Minnesota Governor's Stay Safe MN orders in response to the COVID-19 pandemic, in person review at SHPO and OSA was not allowed. This limited Westwood's ability to review previous survey reports and other materials housed on-site at these locations.

The Project Area is located primarily in Minnesota Archaeological Region 2s – Prairie Lake (South). Sites of earlier prehistoric periods in this region are generally located on islands and peninsulas of lakes, with some villages near major rivers. Winter villages would be located in the wooded areas of large river valleys. Temporary campsites could be found on rivers and around lakes. Late prehistoric large village sites may be found on the terraces of the Minnesota and Blue Earth rivers, with some campsites on islands and peninsulas of lakes (Gibbon et al. 2002).

The far western portion of the Project Area is within Minnesota Archaeological Region 1 – Southwest Riverine. Early prehistoric sites will most likely be near streams and glacial features (Gibbon et al. 2002). Similarly, middle prehistoric sites will also most likely be near rivers and streams. Camps of the Woodland period will most likely be those of temporary use and found on the terraces of significant streams with special use activities occurring anywhere.

Previous Cultural Resources Investigations

SHPO records revealed no documentation of previous cultural resource investigations within the study area, and no previously recorded archaeological sites or historic/architectural resources have been inventoried within the Project Area. Due to restrictions from the COVID pandemic, Westwood was unable to review previous reports housed at SHPO or OSA in order to attempt to verify levels of previous survey.

Archaeological Sites

No previously recorded archaeological sites are within the Project Area. Two sites have been identified within the one-mile buffer (**Exhibit 1**). Site 21MU0049 is an earthwork and artifact scatter located more than 0.70 miles from the Project boundary. Site 21MUaa is an alpha site that consists of an artifact scatter which is located approximately 0.40 miles from the Project boundary. Alpha sites have been identified through historic documentation or landowner/collector's reports but have not been verified by a professional archaeologist.

It should be noted that Site 21MUa is also identified within the one-mile Project Area buffer. Documentation states that this location is a natural geographic feature that was mistakenly identified as a site.

Historic/Architectural Resources

No previously recorded historic/architectural resources are within the Project Area. Twenty historic architectural resources have been identified within the one-mile buffer (**Exhibit 1**). All but three of the inventoried resources are located at least 0.5 miles from the Project Area in the village of Lake Wilson. The remaining three resources are transportation related, including two bridges and a

roadway corridor. A portion of Trunk Highway 43 from Rushford to the Minnesota/South Dakota state line runs along the Project's northern boundary. None of the resources have been evaluated for listing in the NRHP.

Table 2: Previously Recorded Historic/Architectural Resources

Inventory No.	Name	Address	NRHP Eligibility	Project/Buffer
XX-ROD-027	Trunk Hwy 30	NA	Unevaluated	Buffer
MU-CHR-002	Bridge L1548	NA	Unevaluated	Buffer
MU-LED-002	Bridge 51503	NA	Unevaluated	Buffer
MU-LWC-001	School	xxx St. Paul Ave.	Unevaluated	Buffer
MU-LWC-002	Water Tower	NA	Unevaluated	Buffer
MU-LWC-003	Dance Hall	Broadway Ave. & Minnesota Ave.	Unevaluated	Buffer
MU-LWC-004	Lake Wilson City Hall	xxx Carrie Ave.	Unevaluated	Buffer
MU-LWC-005	United Methodist Church	xxx Lincoln Ave.	Unevaluated	Buffer
MU-LWC-006	Depot	xxx Broadway Ave.	Unevaluated	Buffer
MU-LWC-007	Apartment Building	SW corner Carrie Ave. & Broadway Ave.	Unevaluated	Buffer
MU-LWC-008	Lake Wilson Co-Op Elevator & Lumber Company	NW corner Carrie Ave. & Broadway Ave.	Unevaluated	Buffer
MU-LWC-009	Commercial Building	xxx Broadway Ave.	Unevaluated	Buffer
MU-LWC-010	Commercial Building	NA	Unevaluated	Buffer
MU-LWC-011	Barber Shop	NA	Unevaluated	Buffer
MU-LWC-012	First National Bank	NA	Unevaluated	Buffer
MU-LWC-013	State Bank of Lake Wilson	NA	Unevaluated	Buffer
MU-LWC-014	House	NA	Unevaluated	Buffer
MU-LWC-015	House	NA	Unevaluated	Buffer
MU-LWC-016	House	NA	Unevaluated	Buffer
MU-LWC-017	House	NA	Unevaluated	Buffer

Key: Inventory No. = designation applied by SHPO; Name = unofficial name or resource type as listed on inventory form; Address = location as listed on inventory form, verified in GIS if possible; National Register of Historic Places (NRHP) Eligibility = eligibility or listing status in the NRHP; Project/Buffer = location within in Project Area or one-mile buffer.

Other Sources

A review of "An Illustrated Historical Atlas of the State of Minnesota" (Andreas 1874) and historic J. Wm. Trygg Maps (1969) developed from the original township land survey did not indicate any potential cultural resources in the Project Area. Rivers and a lake were observed on both historic maps.

The 1898 Map of Murray County shows that much of Leeds Township in the southwest portion of the county was nearly fully settled before the turn of the twentieth century (E.F. Peterson). Within the Project Area, homesteads were indicated in the SW ¼ of Section 16, the SE ¼ of Section 17, the

S ¼ of Section 22, and the NW ¼ of Section 30. The Chicago, St. Paul, Minneapolis & Omaha (CSPMO) Railroad ran north of the Project Area along a westerly corridor through the town of Hadley and north of Lake Wilson. There were few discernible changes to the area in the 1908 Atlas of Murray County (G.A. Ogle & Co.). In all publications, there were several schoolhouses indicated in the vicinity of the Project, as well as small creeks and low-lying wetlands. Much of the same land remained homesteaded in 1926, with no significant development observed in that year's Murray County Atlas (Anderson Publishing Co.).

Historic aerial photography from 1938 shows many of the structures indicated on the atlases. Modern aerials reveal that several of the historic farmsteads are still extant, although condition or existence of original structures is unknown. Locations where historic farmsteads are no longer present have most likely been cultivated, thereby limiting the likelihood for intact archaeological resources.

Recommendations

A review of the existing cultural resource data indicates that there are no previously documented archaeological sites or inventoried historic/architectural resources within the proposed Project Area. Two archaeological sites and 20 historic/architectural resources have been inventoried within a one-mile buffer of the Project Area. No previously inventoried historic resources within one mile of the Project Area are listed in the NRHP.

Upon review of the archaeological sites and survey data compiled for the defined Project Area, Westwood concludes that the paucity of recorded archaeological sites within the Project Area are not necessarily indicative of a lack of cultural resources in the area, but instead may reflect the lack of survey coverage. The Project Area has a moderate to high potential for cultural resources especially near historic water resources and along the margins of a glacial channel.

As this renewable energy Project is in excess of 50 MW, it must be approved by and a Site Permit issued from the Minnesota Public Utilities Commission (PUC) under the Power Plant Siting Act pursuant to Minnesota Statutes, Chapter 216E and Minnesota Rules, Chapter 7850. Applicable portions of this Phase Ia Cultural Resources Literature Review will be included in the Site Permit Application being prepared for the Project. The PUC typically requires consideration of a project's effects upon cultural resources including the completion of cultural field surveys, and/or consultation with the SHPO.

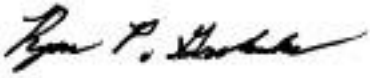
For the above reasons, Westwood recommends a Phase I Archaeological Reconnaissance Survey for locations that may be physically impacted by construction of the proposed Project. Results of the Phase I Archaeological Reconnaissance Survey will be submitted to the PUC as part of the Site Permit Application process for the Project.

If the current Project is deemed a federal undertaking (i.e., requires a federal permit, license, or approval, is located on federally owned or managed land, or receives federal financial assistance), the scope of required cultural resource investigations will be determined by the applicable lead federal agency in cooperation with SHPO and pertinent Tribal Historic Preservation Offices (THPO) as defined in Section 106 of the National Historic Preservation Act of 1966 (as amended) (NHPA).

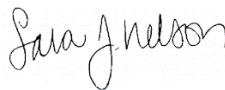
Should you have any questions or comments regarding this Phase Ia Cultural Resource Literature Review, please contact either of the undersigned.

Sincerely,

WESTWOOD PROFESSIONAL SERVICES, INC.



Ryan P. Grohnke
Cultural Resources Manager
ryan.grohnke@westwoodps.com
612-209-3352



Sara J. Nelson
Architectural Historian
sara.nelson@westwoodps.com
952-201-4404

Attachment: Exhibit 1 Cultural Resources in the Project Vicinity

References

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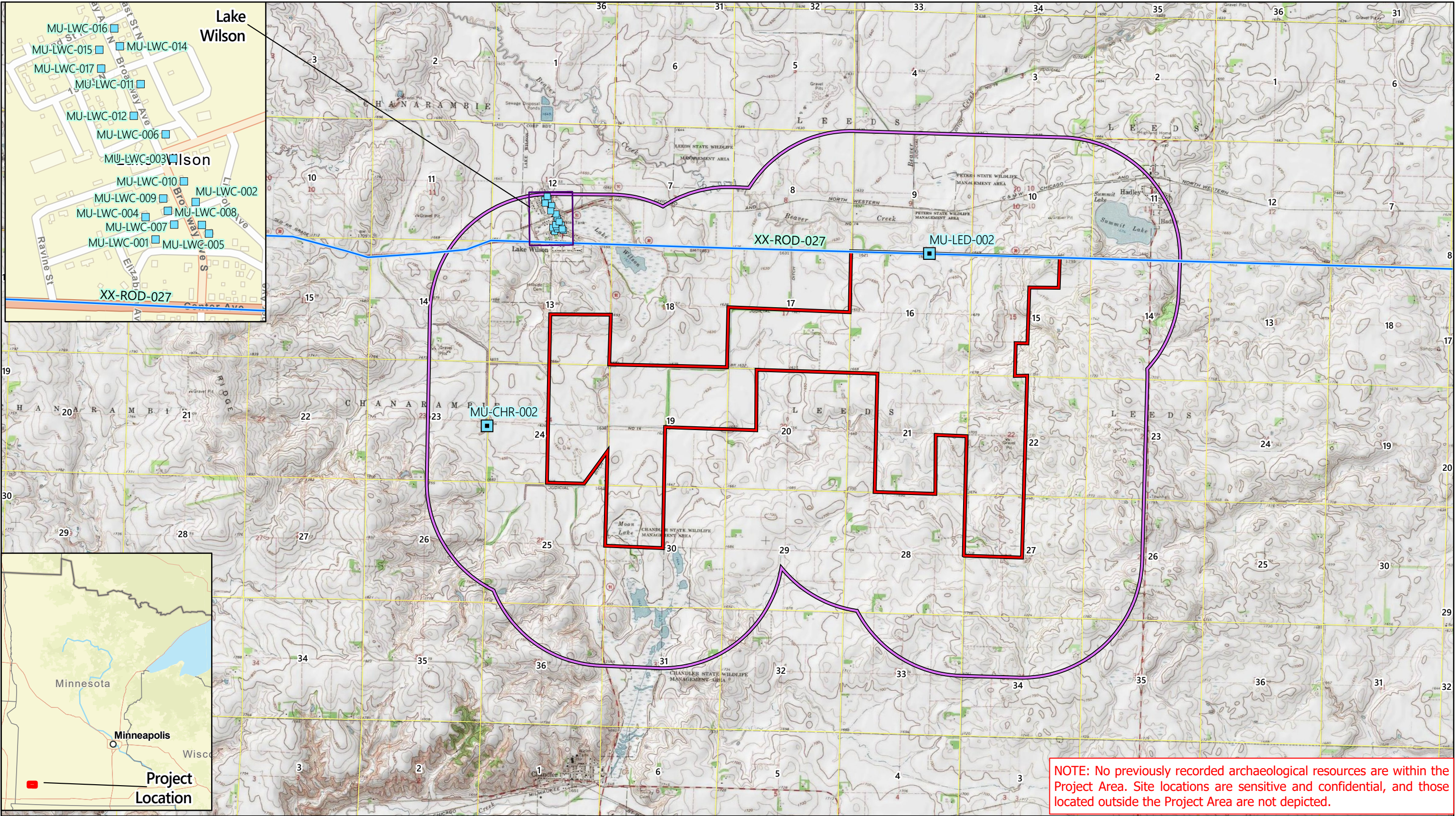
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Lake Wilson Solar Project

Murray County, Minnesota

Cultural Resources in the Vicinity of the Project Area

EXHIBIT 1

Westwood

Toll Free (888) 937-5150 westwoodps.com
Westwood Professional Services, Inc.

Map Document: \\westwoodps.local\Global Projects\0012861.01\GISAnalysis\210728_CRM_SUNLakeWilson_CRM_210728.aprx 9/20/2021 2:45 PM S.Nelson