

Appendices

Appendix A
Agency Correspondence

March 2, 2009

Ms. Sarah Emery
IBERDOROLA RENEWABLES
3749 45th Avenue South
Minneapolis, MN 55406

RE: Elm Creek II Wind Project
Jackson and Martin Counties
SHPO Number: 2009-0980

Dear Ms. Emery:

Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Due to the nature of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified. For your information, we have enclosed a list of consultants who have expressed an interest in undertaking such surveys.

If the project area can be documented as previously disturbed or previously surveyed, we will re-evaluate the need for survey. Previously disturbed areas are those where the naturally occurring post-glacial soils and sediments have been recently removed. Any previous survey work must meet contemporary standards.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office with reference to the appropriate federal agency.

If you have any questions on our review of this project, please contact me at (651) 259-3456.

Sincerely,



Dennis A. Gimmestad
Government Programs and Compliance Officer

Enclosure: List of Consultants



Minnesota Department of Natural Resources

Division of Ecological Resources, Box 25

500 Lafayette Road

St. Paul, Minnesota 55155-4025

Phone: (651) 259-5109 Fax: (651) 296-1811 E-mail: lisa.joyal@dnr.state.mn.us

March 6, 2009

Correspondence # ERDB 20090511

Ms. Sarah Emery
Iberdrola Renewables
3749 45th Avenue South
Minneapolis, MN 55406

RE: Natural Heritage information in the vicinity of the proposed Elm Creek II Wind Project

County	Township (N)	Range (W)	Section(s)
Jackson	103	34	1, 12-36
	103	35	13, 24, 25, 36
	102	34	1-5, 8-12, 15, 16
Martin	104	33	17-20, 29-32
	103	33	5-8, 17-20, 30, 31
	102	33	6, 7

Dear Ms. Emery,

As requested, the Minnesota Natural Heritage Information System has been queried to determine if any rare species or other significant natural features are known to occur within an approximate one-mile radius of the proposed project. Based on this query, several rare features have been documented within the search area (for details, see the enclosed database reports; please visit the Rare Species Guide at <http://www.dnr.state.mn.us/rsg/index.html> for more information on the biology, habitat use, and conservation measures of these rare species). Please address the following issues in the Public Utilities Commission (PUC) Site Permit Application for this project:

- Arzt Wildlife Management Areas (WMA) is located within the project boundary (a GIS shapefile of the State Wildlife Management Area Boundaries can be downloaded from the DNR Data Deli at <http://deli.dnr.state.mn.us/>). The boundary of the proposed project should be modified to explicitly exclude all WMAs. In addition, we recommend a minimum ¼ mile setback from all WMAs for all wind turbines. Please contact the Area Wildlife Manager, Randy Markl at 507-831-2900 x226, to discuss any concerns he may have about turbines being sited near the WMA.
- Sullivant’s milkweed (*Asclepias sullivantii*), a state-listed threatened plant, has been documented in native prairie remnants in the vicinity of the proposed project. Because this plant is associated with native prairie, the wind turbines and associated infrastructure will need to avoid any native prairie remnants that may remain within the project boundary. If this is not feasible, a botanical survey of any affected prairie remnants will be required. **Please contact me if construction activities are planned within any native prairie remnants.** We will need to discuss potential surveyors, survey protocol, and other requirements before any survey work is initiated.
- If applicable, please send me a copy of the native prairie protection and management plan (Section III.C.6. of the Site Permit). The plan should include measures to avoid impacts to native prairie and measures to mitigate for impacts if unavoidable.
- Please send me a copy of the Preconstruction Biological Preservation Survey (Section III.D.1. of the Site Permit) required by the PUC.

- Further guidance on wind farm siting can be found at http://www.fws.gov/midwest/Eco_Serv/wind/index.htm.

The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. However, the NHIS is not an exhaustive inventory and thus does not represent all of the occurrences of rare features within the state. Therefore, ecologically significant features for which we have no records may exist within the project area.

The enclosed results include an Index Report and a Detailed Report of records in the Rare Features Database, the main database of the NHIS. To control the release of specific location information, which might result in the destruction of a rare feature, both reports are copyrighted.

The Index Report provides rare feature locations only to the nearest section, and may be reprinted, unaltered, in an environmental review document (e.g., EAW or EIS), municipal natural resource plan, or report compiled by your company for the project listed above. If you wish to reproduce the index report for any other purpose, please contact me to request written permission. **The Detailed Report is for your personal use only as it may include specific location information that is considered nonpublic data under *Minnesota Statutes*, section 84.0872, subd. 2. If you wish to reprint or publish the Detailed Report for any purpose, please contact me to request written permission.**

This letter does not constitute review or approval by the Department of Natural Resources as a whole. Instead, it identifies issues regarding known occurrences of rare features and potential effects to these rare features. Additional rare features for which we have no data may be present in the project area, or there may be other natural resource concerns associated with the proposed project. For these concerns, please contact your DNR Regional Environmental Assessment Ecologist, Kevin Mixon, at 507-359-6073. Please be aware that additional site assessments or review may be required.

Thank you for consulting us on this matter, and for your interest in preserving Minnesota's rare natural resources. An invoice will be mailed to you under separate cover.

Sincerely,



Lisa Joyal
Endangered Species Environmental Review Coordinator

enc. Rare Features Database: Index Report
 Rare Features Database: Detail Report
 Rare Features Database Reports: An Explanation of Fields

cc: Kevin Mixon
 Matt Langan

Printed March 2009
Data valid for one year

Index Report of records within 1 mile radius of:

Elm Creek II Wind Project
Jackson and Martin Counties

Element Name and Occurrence Number	Federal Status	MN Status	State Rank	Global Rank	Last Observed Date	EO ID #
Jackson County, MN						
<u>Asclepias sullivantii</u> (Sullivant's Milkweed) #36 Location Description: T102N R34W S14		THR	S2	G5	1997-08-23	22255
<u>Asclepias sullivantii</u> (Sullivant's Milkweed) #37 Location Description: T102N R34W S19, T102N R34W S18		THR	S2	G5	1997-08-23	22262
<u>Dry Hill Prairie (Southern) Type</u> #283 Location Description: T103N R35W S35		N/A	S2	GNR	2001-08-19	29108
<u>Lanius ludovicianus</u> (Loggerhead Shrike) #68 Location Description: T102N R35W S14, T102N R35W S13, T102N R35W S12, T102N R35W S34, T [...]	No Status	THR	S2B	G4	1992	9819
<u>Mesic Prairie (Southern) Type</u> #218 Location Description: T102N R34W S14		N/A	S2	GNR	1997-08-24	14420
<u>Mesic Prairie (Southern) Type</u> #239 Location Description: T102N R34W S19, T102N R34W S18		N/A	S2	GNR	1997-08-24	24327
Jackson, Martin County, MN						
<u>Mesic Prairie (Southern) Type</u> #247 Location Description: T102N R34W S13, T102N R33W S18		N/A	S2	GNR	1997-08-27	24377
Martin County, MN						
<u>Asclepias sullivantii</u> (Sullivant's Milkweed) #24 Location Description: T102N R33W S17, T102N R33W S18		THR	S2	G5	1997-08-08	22247
<u>Mesic Prairie (Southern) Type</u> #246 Location Description: T102N R33W S17		N/A	S2	GNR	1997-08-08	24382

Records Printed = 9



Minnesota Department of Natural Resources

Division of Ecological Resources – Reg. 4

261 Hwy 15 South

New Ulm, MN 56073-8915

Phone: (507) 359-6073 Fax: (507) 359-6018 E-mail: kevin.mixon@dnr.state.mn.us

March 19, 2009

Sarah Emery
Iberdrola Renewables, Inc.
3749 45th Avenue South
Minneapolis, MN 55406

In re: Elm Creek II Wind Project
Preliminary Review
Jackson and Martin Counties, MN

Dear Sarah:

The Minnesota Department of Natural Resources (DNR) has received information concerning the above referenced wind project located in Jackson and Martin Counties, MN. The DNR is providing the following comments as a mechanism to collaboratively work together to identify potential natural resource issues that should be considered during project development.

The project area contains the Arzt Wildlife Management Area (WMA). The DNR recommends that no direct impacts occur to these public recreational lands from tower construction, transmission lines, or road networks associated with the project. In addition, a buffer should be established around all WMA's that is a minimum of five times the rotor blade diameter. This buffer may be re-evaluated as the project progresses if more information on sensitive resources associated with the WMA are discovered. State Wildlife Management Area boundaries can be downloaded from the DNR Data Deli (<http://deli.dnr.state.mn.us/>).

The project area contains numerous areas enrolled in the Conservation Reserve Program and Reinvest in Minnesota easements that could potentially be affected by this project. The Farm Service Agency located in the county(s) where the project is occurring should be contacted (<http://www.fsa.usda.gov/FSA/stateoffapp?mystate=mn&area=home&subject=landing&topic=landing>) in order to coordinate potential issues involving these properties.

The project area contains numerous past occurrences of species of special concern and native prairie remnants as tracked by the Minnesota Natural Heritage Information System as indicated in the March 6, 2009 letter (attached) from Lisa Joyal. Please continue to coordinate Natural Heritage issues with Lisa Joyal (651-259-5109) if potential impacts may occur.

Public Waters are within the project area and further coordination is required with the DNR Division of Lands and Minerals if any of these areas are to be crossed or impacted, as you may need a License for Utility Crossing or Work Permit. For information on where the Public Waters are located in your project area go to the following site and click on the Public Waters Inventory (PWI) Maps Download button:

http://www.dnr.state.mn.us/waters/watermgmt_section/pwi/download.html.

Minnesota Statute 103G.2455, Subdivision 1, a public or private corporation, or a person, must have a DNR Public Waters Work Permit to construct, reconstruct, remove, abandon, transfer ownership of, or make any change in a reservoir, dam, or waterway obstruction on public waters; or change or diminish the course, current, or cross section of public waters, entirely or partially within the state, by any means, including filling, excavating, or placing of materials in or on the bed of public waters. Additional information on the Public Waters Work Permit process can be found at:

http://www.dnr.state.mn.us/waters/watermgmt_section/pwpermits/requirements.html.

Minnesota Statute 84.415 requires a DNR license be obtained for the passage of any utility over, under or across any state land or public waters. Information concerning the need and process of obtaining a License for Utility can be found at

http://www.dnr.state.mn.us/permits/utility_crossing/index.html.

Potential wetland impacts could involve the Wetland Conservation Act (WCA). Potential wetland impact(s) may require a boundary delineation and potential mitigation. If wetland impacts may occur you should contact the Board of Water and Soil Resources (www.bwsr.state.mn.us).

Additional project considerations include utilities and roads that could cross or impact waters, streams, or wetlands. Discharge of fill or dredge material in waters of the U.S. are regulated under Section 404 of the Clean Water Act and may require a permit from the U.S. Army Corp of Engineers.

The DNR recommends 2 years of post construction mortality studies using the Minnesota Protocols to Monitor Bat & Bird Mortality at Large Wind Energy Conversion Systems (attached). The DNR should receive yearly mortality reports on January 1 of each year that includes the information as outlined in the Post-Construction Report Guidelines (attached).

This review constitutes an office review only and is not a substitute for reviewing potential turbine placement in the field. A field review of the project should be conducted when the preliminary tower locations are determined. The DNR will provide a second review of the project that is site specific to the proposed tower locations, transmission lines, and access roads. The field review should be conducted prior to applying for a permit from the Public Utilities Commission.

Minnesota Administrative Rules 7836.0500, Subpart 7, requires the applicant to analyze potential environmental impacts of the project, proposed mitigative measures, and any adverse environmental effects that cannot be avoided. Groundwater resources, surface waters, wetlands, vegetation, wildlife, rare and unique natural resources, etc. are included. In order to address the potential environmental impacts the applicant should resolve all outstanding issues with the DNR prior to applying for the Large Wind Energy Conversion System permit from the Public Utilities Commission.

The DNR looks forward to working in a positive and collaborative manner on this project to ensure that sustainable energy sources are developed while protecting Minnesota's natural resources. Please contact me directly at 507-359-6073 if you have any questions.

Very truly yours,



Kevin Mixon
Regional Environmental Assessment Ecologist
Division of Ecological Services

Cc: Lisa Joyal, DNR
Matt Langan, DNR
John Schladweiler, DNR
Ken Varland, DNR
Randy Markl, DNR
Jill Utrup, U.S. FWS



Minnesota Department of Natural Resources

Division of Ecological Resources, Box 25

500 Lafayette Road

St. Paul, Minnesota 55155-4025

Phone: (651) 259-5100 Fax: (651) 296-1811 E-mail: lisa.joyal@dnr.state.mn.us

March 6, 2009

Correspondence # ERDB 20090511

Ms. Sarah Emery
Iberdrola Renewables
3749 45th Avenue South
Minneapolis, MN 55406

RE: Natural Heritage information in the vicinity of the proposed Elm Creek II Wind Project

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Dear Ms. Emery,

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DNR Information: 651-296-6157

1-888-646-6367

TTY: 651-296-5484

1-800-657-3929

An Equal Opportunity Employer Who Values Diversity

- Further guidance on wind farm siting can be found at http://www.fws.gov/midwest/Eco_Serv/wind/index.htm.

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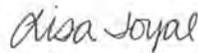
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Sincerely,



Lisa Joyal
Endangered Species Environmental Review Coordinator

enc. Rare Features Database: Index Report
Rare Features Database: Detail Report
Rare Features Database Reports: An Explanation of Fields

cc: Kevin Mixon
Matt Langan

Printed March 2009
Data valid for one year

Minnesota Natural Heritage Information System: Rare Features Database
Index Report of records within 1 mile radius of:
Elm Creek II Wind Project
Jackson and Martin Counties

Page 1 of 1

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Records Printed = 9

Appendix B
Cultural Resources Background Study



March 16, 2009

Ms. Sarah Emery
Senior Permitting Manager
Iberdrola Renewables
3749 45th Avenue South
Minneapolis, MN 55406

Re: Archaeological and Historic Structures Critical Issues Analysis for Elm Creek II Wind Farm, Jackson and Martin Counties, Minnesota

Dear Ms. Emery:

Thank you for the opportunity to provide this analysis of potential critical cultural issues during the development the Elm Creek II Wind Farm Project (Project). HDR Engineering, Inc. (HDR) reviewed state and federal permitting requirements and available records at the Minnesota State Historic Preservation Office (SHPO) and Minnesota Historical Society (MHS) in order to:

- Understand the regulatory framework within which the project would be permitted
- Capture a baseline of information regarding known archaeological and historic resources in the vicinity
- Understand the potential presence of as-yet unknown archaeological sites in the project vicinity

We will use the information gathered to recommend a course of action for cultural resources tasks as the project moves into the next phases of development.

We understand that Iberdrola Renewables, Inc. (IBR) plans to locate the project in Jackson and Martin counties, Minnesota, and would develop up to a 150 megawatt (MW) wind farm, consisting of up to 100 wind turbine generators (Figure 1, attached). Associated facilities plans for construction and operations include gravel access roads to turbines, underground and overhead 34.5 kilovolt (kV) electrical collection system, substation, operations and maintenance building, two permanent meteorological towers, and a SODAR unit. IBR understands that construction of the project could potentially have negative impacts to archaeological sites and historic structures if they exist in the project footprint, and therefore has tasked HDR with this overview to ascertain the nature of any impacts.

Legal Justification/Regulatory Environment

The Minnesota Public Utilities Commission (PUC), as a condition of the Large Wind Energy Conversion System (LWECS) site permit, tasks the applicant to coordinate with the State Historic Preservation Office (SHPO) and the Office of the State Archaeologist (OSA) as early as possible regarding archaeological

field survey requirements in order to identify significant archaeological sites that may be affected by the project. In addition, under Minnesota Statute Chapter 216F (Wind Siting Act), Minnesota Rules Chapter 7836, and Minnesota Statute Chapter 138.661-138.669 (Minnesota Historic Sites Act), the applicant for a site permit must consider impacts to those historic structures currently listed on the State and the National Registers of Historic Places.

We understand that IBR sent a letter to SHPO on January 27, 2009, requesting SHPO review under PUC rules and the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act (attached). SHPO responded in writing on March 2, 2009, recommending that IBR conduct an archaeological inventory and evaluation for the project in areas not previously disturbed or previously surveyed (attached). The inventory and evaluation would result in a technical report that IBR would share with SHPO, as well as OSA, particularly if archaeological sites are identified which require designation of Smithsonian trinomials.

Background Research Results

As an initial step in the process of complying with the statutes, HDR initiated data collection in February 2009. HDR staff members gathered information for the area within the external project boundary and a one-mile buffer. They collected known archaeological and historic structures resources information derived from previous professional cultural resources surveys and reported archaeological site leads, from SHPO in St. Paul, Minnesota. Collected data includes archaeological site files and previous cultural resources studies and reports. In addition, HDR reviewed nineteenth-century Public Land Survey (PLS) maps to identify potential historic-period cultural features that once existed in the project area.

Cultural Resources Reports

HDR submitted a data request for a cultural inventory for the project area, including archaeological sites and historic structures, to the Minnesota SHPO on February 3, 2009. HDR received the results of the database query on February 9, 2009. HDR then collected information for all sites of interest within, and one mile around, the Project area on February 10, 2009. Table 1 outlines the area HDR reviewed for existing archaeological and historic structures resources, which make up the Elm Creek II Wind Farm project area, including the one-mile buffer. HDR notes that there are no State Register sites within Jackson or Martin counties.

Table 1: Elm Creek II Project Area

County	Township	Range	Section
Jackson	102N	34W	1-5, 8-12, 15-16
Jackson	103N	34W	1, 2, 11-36
Jackson	103N	35W	13, 24-25, 36
Jackson	103N	33W	29
Martin	103N	33W	5-8, 17-20, 30-31
Martin	104N	33W	17-20, 29-32
Martin	103N	33W	29

HDR identified three archaeological resource investigation reports within the project area and the one-mile buffer (Table 2).

Table 2: Previous Cultural Resource Investigations in and Within One Mile of the Project Area

Report Date	Report Title	Author(s)/Association	Comment
2008	Phase I Archaeological Survey for the Elm Creek Wind Project in Jackson and Martin counties, Minnesota	Frank Florin and James Lindbeck; Florin Cultural Resources Services	Two of four precontact sites identified may be eligible for the NRHP
2004	Trimont Area Wind Project: Phase I Archaeological Investigation and Phase I/II Architectural History Investigation	Dan Pratt, Erika Palmer, Dylan Eigenberger, and Michael Madson; HDR Engineering, Inc.	No archaeological resources identified
2000	Report on Cultural Resource Reconnaissance Survey Conducted Along Proposed Reconstruction of CSAH 44 From West Martin County Line East to Trimont (Cedar And Galena townships), Martin County, Minnesota.	Christina Harrison; Archaeological Research Services	Road reconstruction survey. No new sites reported.

Archaeological Sites

Two previously recorded archaeological sites are within the project area and the one-mile buffer (Table 3). Site 21JK0034 is a sparse scatter of chipped-stone waste flakes within an agricultural field on a hilltop and toe slope northwest of South Fork Elm Creek (Florin and Lindbeck 2008). The site was recommended not eligible for listing on the NRHP because it lacked integrity and had a limited artifact assemblage. SHPO concurred with that recommendation (Letter, January 17, 2008). Site 21MRq reportedly falls within the project boundaries, although its specific location is not known. The site, the

historically-reported location of an early historic-period fur-trade era trading post, has not been field-checked by a professional archaeologist.

Table 3: Archaeological Sites in and Within One Mile of the Project Area

County	Site Number	Site Type	Site Name	Location			NRHP Status
				T	R	S	
Jackson	21JK0034	Artifact Scatter/Lithic Scatter	N/A	103	34	10	Recommended not eligible
Martin	21MRq	Trading Post	N/A	103	34	32	Not Evaluated

Standing Structures

As stated above, the Wind Siting Act requires the applicant for a site permit to consider impacts to those historic structures currently listed on the State and National Registers of Historic Places. HDR reviewed those lists, as well as the previously inventoried historic structures on file at SHPO. Historic structures are those standing structures and aboveground properties that typically are more than 50 years old at the time of a survey. No historic structures listed on the NRHP or on the State Register are within the project area or within one mile.

A review of SHPO site files showed that 68 previously recorded historic structures are within the project area and the one-mile buffer (Table 4). The historic properties consist mainly of farmsteads scattered throughout the project area, and commercial structures associated with the community of Alpha. While these properties were inventoried during what appears to be a county survey in 1985, none of these properties has been formally evaluated for listing on the NRHP. Inventories performed for planning purposes do not typically result in NRHP evaluations due to funding constraints. Subsequent evaluations could happen if exceptional properties are identified or federal undertakings arise in the vicinity that require review of the historic built environment. A lack of evaluations of these properties shown on Table 4 could indicate that no federal undertakings occurred in the vicinity or that these properties are not prominent enough within the community to warrant additional research or historic notoriety.

Table 4: Historic Structures in and within One Mile of the Project Area

County	Site Number	Site Name	Location			NRHP Status
			T	R	S	
Jackson	JK-ALC-001	House	102	34	13	Not Evaluated
Jackson	JK-ALC-002	Commercial Building	102	34	13	Not Evaluated
Jackson	JK-ALC-003	Schmidt Beer	102	34	13	Not Evaluated
Jackson	JK-ALC-004	Commercial Building	102	34	13	Not Evaluated
Jackson	JK-ALC-005	Commercial Building	102	34	13	Not Evaluated
Jackson	JK-ALC-006	Commercial Building	102	34	13	Not Evaluated
Jackson	JK-ALC-007	City Hall	102	34	13	Not Evaluated
Jackson	JK-ALC-008	Alpha Bank	102	34	13	Not Evaluated
Jackson	JK-ALC-009	Frigidaire Appliances	102	34	13	Not Evaluated
Jackson	JK-ALC-010	First Presbyterian Church	102	34	13	Not Evaluated
Jackson	JK-ALC-011	Cargill Elevator	102	34	13	Not Evaluated
Jackson	JK-ALC-012	Cargill Elevator	102	34	13	Not Evaluated
Jackson	JK-ETP-001	Enterprise Town Hall	103	34	14	Not Evaluated
Jackson	JK-EWT-004	Farmstead	103	34	1	Not Evaluated
Jackson	JK-EWT-005	Farmstead	103	34	1	Not Evaluated
Jackson	JK-EWT-006	Farmstead	103	34	1	Not Evaluated
Jackson	JK-EWT-007	Farmstead	103	34	2	Not Evaluated
Jackson	JK-EWT-008	Farmstead	103	34	2	Not Evaluated
Jackson	JK-EWT-009	Farmstead	103	34	2	Not Evaluated
Jackson	JK-KIM-039	Farmstead	104	34	24	Not Evaluated
Jackson	JK-KIM-040	Farmstead	104	34	25	Not Evaluated
Jackson	JK-KIM-060	Corn Crib	104	34	36	Not Evaluated
Jackson	JK-KIM-061	Farmstead	104	34	36	Not Evaluated
Jackson	JK-KIM-062	Farmstead	104	34	36	Not Evaluated
Jackson	JK-WIS-001	Farmstead	102	34	3	Not Evaluated
Martin	MR-CED-002	Alpha	104	33	20	Not Evaluated

Table 4: Historic Structures in and within One Mile of the Project Area

County	Site Number	Site Name	Location			NRHP Status
			T	R	S	
		Mennonite Church				
Martin	MR-CED-003	Church	104	33	31	Not Evaluated
Martin	MR-CED-010	Bridge No. L7230	104	33	7	Not Evaluated
Martin	MR-CED-011	Farmstead	104	33	7	Not Evaluated
Martin	MR-CED-012	Farmstead	104	33	8	Not Evaluated
Martin	MR-CED-013	Farmstead	104	33	8	Not Evaluated
Martin	MR-CED-014	Farmstead	104	33	8	Not Evaluated
Martin	MR-CED-015	Farmstead	104	33	8	Not Evaluated
Martin	MR-CED-019	Farmstead	104	33	16	Not Evaluated
Martin	MR-CED-020	Farmstead	104	33	16	Not Evaluated
Martin	MR-CED-021	Farmstead	104	33	16	Not Evaluated
Martin	MR-CED-022	Cedar Town Hall	104	33	17	Not Evaluated
Martin	MR-CED-023	Farmstead	104	33	17	Not Evaluated
Martin	MR-CED-024	Hog Finishing Barns	104	33	17	Not Evaluated
Martin	MR-CED-025	Farmstead	104	33	17	Not Evaluated
Martin	MR-CED-026	Farmstead	104	33	17	Not Evaluated
Martin	MR-CED-027	Great River Energy Lake	104	33	19	Not Evaluated
Martin	MR-CED-028	Farmstead	104	33	19	Not Evaluated
Martin	MR-CED-029	Farmstead	104	33	19	Not Evaluated
Martin	MR-CED-030	Elm Creek Pipe Station	104	33	20	Not Evaluated
Martin	MR-CED-031	Farmstead	104	33	20	Not Evaluated
Martin	MR-CED-032	Farmstead	104	33	20	Not Evaluated
Martin	MR-CED-033	Cedar Lutheran Cemetery	104	33	20	Not Evaluated
Martin	MR-CED-034	Farmstead	104	33	20	Not Evaluated
Martin	MR-CED-040	Farmstead	104	33	28	Not Evaluated
Martin	MR-CED-041	Farmstead	104	33	28	Not Evaluated
Martin	MR-CED-042	Farmstead	104	33	28	Not Evaluated
Martin	MR-CED-043	Farmstead	104	33	29	Not Evaluated

Table 4: Historic Structures in and within One Mile of the Project Area

County	Site Number	Site Name	Location			NRHP Status
			T	R	S	
Martin	MR-CED-044	Farmstead	104	33	30	Not Evaluated
Martin	MR-CED-045	Farmstead	104	33	30	Not Evaluated
Martin	MR-CED-046	Farmstead	104	33	30	Not Evaluated
Martin	MR-CED-047	Farmstead	104	33	30	Not Evaluated
Martin	MR-CED-048	Bridge	104	33	31	Not Evaluated
Martin	MR-CED-049	Bridge	104	33	31	Not Evaluated
Martin	MR-CED-050	Farmstead	104	33	31	Not Evaluated
Martin	MR-CED-051	Farmstead	104	33	31	Not Evaluated
Martin	MR-CED-052	Farmstead	104	33	31	Not Evaluated
Martin	MR-CED-053	Farmstead	104	33	32	Not Evaluated
Martin	MR-CED-054	Farmstead	104	33	32	Not Evaluated
Martin	MR-CED-055	Farmstead	104	33	32	Not Evaluated
Martin	MR-CED-056	Farmstead	104	33	33	Not Evaluated
Martin	MR-CED-057	Farmstead	104	33	33	Not Evaluated
Martin	MR-ECK-003	Bridge No.89478	103	33	8	Not Evaluated

Historic Map Review

HDR accessed and reviewed historic PLS maps for the project area and the one-mile buffer from the MHS online library (<http://www.mnhs.org/collections/digitalmaps/index.htm>). The maps illustrate environmental conditions and note elevation variations across the landscape and watercourses during the mid 1880s. In general, these maps indicate historic-period land use within the project area, including roads and trail systems where applicable (Table 5). Linear historic features such as roads and trails may be an indication that historic archaeological sites are present nearby. The presence of water features and prominent landscape features indicates that precontact archaeological sites may be present in the vicinity. This is particularly helpful when identifying high probability areas that may have been modified since settlement by historic-period land use, such as drain tiling, farming, and tree clearing.

Table 5: Public Land Survey Map Data of the Project Area and the One-Mile Buffer

Township	Range	PLS Date	Cultural Features/Location
102	33	1854	Stream tributary through Section 7
102	34	1858	Road from Mankato to Sioux City in section 5; stream running through sections 15 and 16
103	33	1854	Stream and bottomland swamp in Section 8; prairie soil found in Section 20
103	34	1858	Stream running through sections 16, 17, 19, 20, 21, 29, 30 and 31; road from Mankato in sections 12, 14, 15, 22, 27, 28, 31, 32 and 33
103	35	1859	None
104	33	1858	Lake in sections 19 and 20; stream running through Section 32

The PLS maps for the project vicinity illustrate a gently rolling, treeless prairie environment with a few streams and creeks and scattered wetlands.

Probability for Archaeological Resources

After reviewing the data on recorded archaeological site information, and in previous survey reports, HDR suggests that areas exist within the proposed project boundary that have a relatively high potential for containing precontact and historic archaeological resources. These areas may be on elevated land and areas near existing or former permanent water sources. The data show that at least one historic archaeological site (21MRq) may be within the project boundary.

Recommendations

No standing structures or other properties in the immediate vicinity are listed on the State or National Registers; HDR does not believe, based on the existing information, that IBR would be required to conduct an architectural inventory unless a responsible federal agency indicates that such a survey would be necessary for compliance with Section 106 or another federal statutory requirements.

Archaeological sites could be impacted by construction of the proposed Project. Based on our review of the existing archaeological resources records and the project regulatory environment, we recommend that IBR do the following:

- Develop a preliminary project construction footprint that includes proposed turbine locations, temporary and permanent access roads, underground and overhead cable alignments, operations and maintenance facilities, and staging and laydown areas;
- Have a professional archaeologist review the proposed construction footprint and identify specific areas to be targeted during the field survey and summarize that strategy in a field design;
- Determine costs and schedule associated with field review of the targeted areas and reporting;

- Coordinate individually with SHPO and OSA to discuss the proposed field strategy and seek input on the field design;
- Once access is available, begin field investigation to identify archaeological sites in the construction footprint;
- Require the field archaeologist to provide preliminary recommendations about National Register eligibility. Should identified archaeological sites be recommended as potentially eligible for listing, then adjust project components to avoid the sites or coordinate with SHPO and OSA;
- File a report with SHPO and OSA on the results of the archaeological inventory and site avoidance measures. Finalize the document record with PUC by providing SHPO and OSA comments;
- If sites cannot be avoided, IBR should advise SHPO and OSA of a plan to evaluate the sites for NRHP eligibility, seek their input on the plan, and then carry out the evaluation;
- Should the site be recommended eligible, coordinate with SHPO on a finding of eligibility and then, if impacts are unavoidable, develop a strategy to mitigate those impacts, and;
- Report on the results of the evaluation or mitigation work and finalize the document record with the PUC by providing them with SHPO and OSA comments and reports.

Conclusion

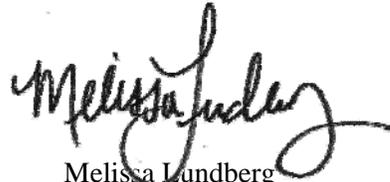
Thanks for the opportunity to provide this information to IBR. Should you have any questions, please do not hesitate to contact one of us at 763-591-5400.

Sincerely,

HDR Engineering, Inc.



Michael Justin
Senior Archaeologist



Melissa Lundberg
Archaeological Technician

Cc: Michael Madson, HDR
Joyce Pickle, HDR

Attachments: Figure 1, Project Location Map
Iberdrola Letter to Minnesota SHPO, January 27, 2009
SHPO Reply to Iberdrola, March 2, 2009

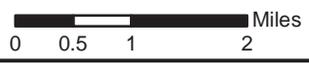
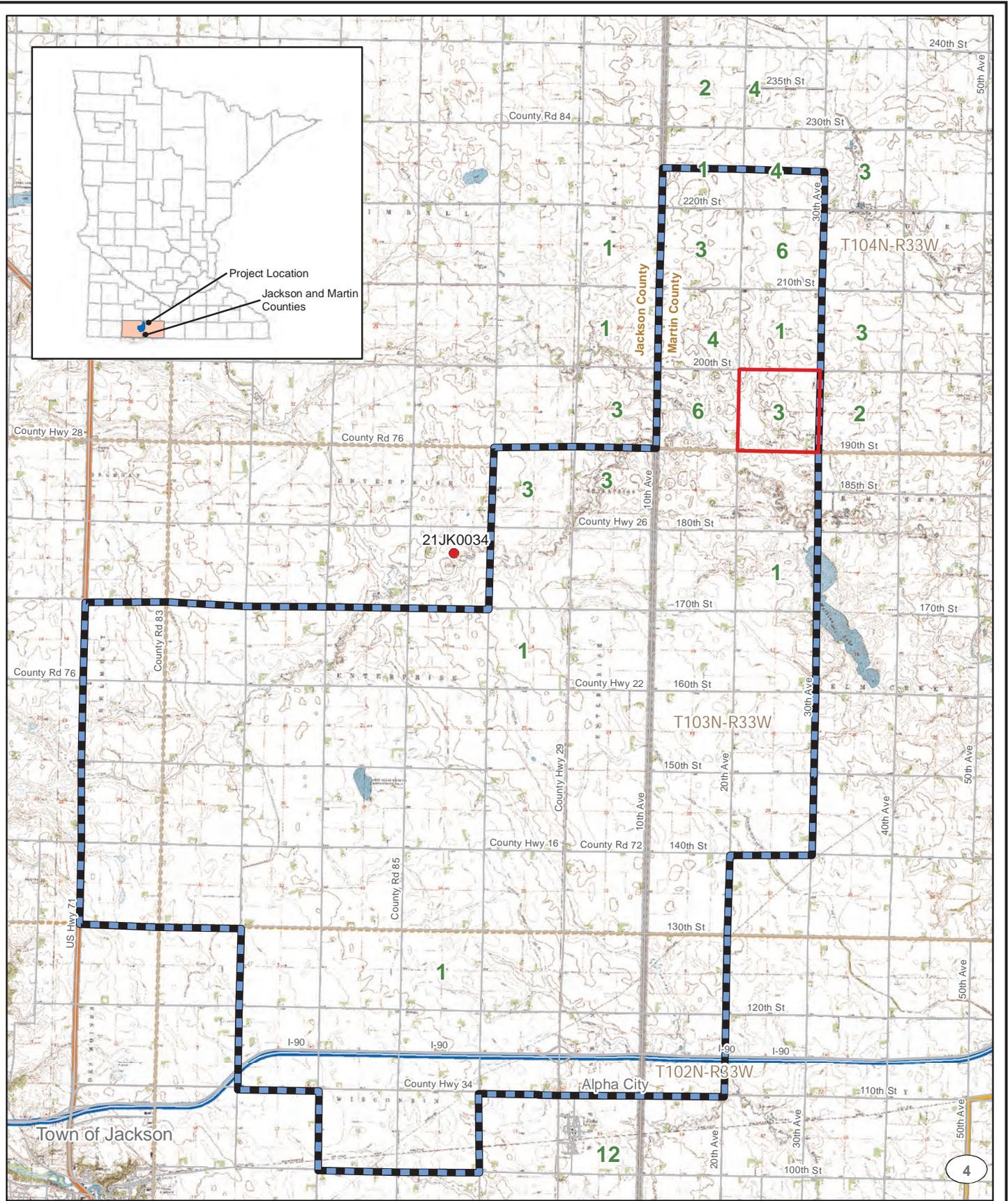


Figure 1 - Project Location and Documented Archaeological Sites
 Elm Creek II Wind Project
 Iberdrola Renewables
 Jackson and Martin Counties, MN

- Legend**
- Elm Creek II Project Boundary
 - Archaeological Sites
 - Suspected location of Site 21MRq
 - Limited Access Freeway
 - Highway
 - Secondary Roads
 - Local Roads
 - # - Number of standing structures in the section



January 27, 2009

Ms. Britta Bloomberg
Minnesota State Historic Preservation Office
345 Kellogg Boulevard West
St. Paul, MN 55102-1906

RE: Iberdrola Renewables Elm Creek II Wind Project in Jackson and Martin Counties,
Minnesota

Dear Ms. Bloomberg,

Iberdrola Renewables (IBR) (formerly PPM Energy) is proposing the Elm Creek II Wind Project in Jackson and Martin Counties, Minnesota. IBR's operational Trimont and Elm Creek Wind Projects are located immediately north of the proposed Elm Creek II Wind Project.

IBR requests your review of the Elm Creek II Wind Project to identify potential impacts and any permits that the project might require. IBR is applying to the Minnesota Public Utilities Commission for a Large Wind Energy Conversion System (LWECS) Site Permit (MN Rules Chapter 7836) in 2009. This request is pursuant to PUC rules, the requirements of the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act. This undertaking does not involve federal funding or permitting and is not subject to federal historic preservation regulations.

The proposed project is located in Jackson and Martin Counties, Minnesota and will be up to 150 megawatts (MW) in size, consisting of up to 100 wind turbine generators. IBR has not made a final selection on turbines for the project and proposes to permit the project for a range in turbine sizes from 1.5 to 3.0 MW. Associated facilities include gravel access roads to turbines, underground and overhead 34.5 kilovolt (kV) electrical collection system, substation, operations and maintenance (O & M) building, two permanent meteorological towers and a SODAR unit. Although turbine locations, access roads and electrical connections have not been determined at this time, the following table identifies sections within the proposed project boundary.



Elm Creek II Project Area

County	Township	Range	Sections
Jackson	102 N	34 W	1-5, 8-12, 15-16
Jackson	103 N	34 W	1, 12-36
Jackson	103 N	35 W	13, 24-25, 36
Martin	102 N	33 W	6-7
Martin	103 N	33 W	5-8, 17-20, 30-31
Martin	104 N	33 W	17-20, 29-32

Your input will assist IBR in their review of this project. Enclosed is a project location map to facilitate your review. If you have any questions relating to this project, please contact me at 612-309-2713 (sarah.emery@iberdrolausa.com) or Mike Justin from HDR at 763-591-5423 (mjustin@hdrinc.com).

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Sarah L. Emery".

Sarah Emery
Senior Permitting Manager

Enclosure: Project Location Map

cc: Adam Sokolski, Iberdrola Renewables
Mike Justin, HDR Engineering, Inc.

March 2, 2009

Ms. Sarah Emery
IBERDOROLA RENEWABLES
3749 45th Avenue South
Minneapolis, MN 55406

RE: Elm Creek II Wind Project
Jackson and Martin Counties
SHPO Number: 2009-0980

Dear Ms. Emery:

Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Due to the nature of the proposed project, we recommend that an archaeological survey be completed. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation, and should include an evaluation of National Register eligibility for any properties that are identified. For your information, we have enclosed a list of consultants who have expressed an interest in undertaking such surveys.

If the project area can be documented as previously disturbed or previously surveyed, we will re-evaluate the need for survey. Previously disturbed areas are those where the naturally occurring post-glacial soils and sediments have been recently removed. Any previous survey work must meet contemporary standards.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal license or permit, it should be submitted to our office with reference to the appropriate federal agency.

If you have any questions on our review of this project, please contact me at (651) 259-3456.

Sincerely,



Dennis A. Gimmestad
Government Programs and Compliance Officer

Enclosure: List of Consultants