

**APPENDIX C**  
**Blondo Consulting:**  
**Cultural Resources Review**



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## **RE: Preliminary Cultural Resources Assessment of the Proposed Community Wind South LWECS Project, Nobles County, Minnesota**

Blondo Consulting, LLC (Blondo Consulting) has conducted a Preliminary Cultural Resources Assessment of the proposed Community Wind South LWECS Project in Nobles County, Minnesota. The Area of Potential Effect (APE) includes the proposed project area located within the following: Township 103 North, Range 41 West, Sections 17-20 and 30, and Township 103 North, Range 42 West, Sections 13, 23 and 24. Also assessed as a ½-mile buffer surrounding the APE. The purpose of the assessment was to learn whether any previously identified archaeological sites or historic properties exist within the APE.

On July 26, 2011, Steven J. Blondo conducted background research at the Office of the State Archaeologist and State Historic Preservation Office. Two previously identified archaeological sites were found within the project APE. Both sites were identified during the 1979 Statewide Rock River Archaeological Survey. Both sites (21NO0028 “The Indian Hill Site II” and 21NO0029 “The Indian Hill Site I”) consist of unknown prehistoric artifact scatters. Both sites are located within Township 103 North, Range 41 West, Section 18.

The proposed project lies in an area rich in cultural resources. A history of survey resulting in the identification of unrecorded sites evidences high potential for cultural resources within the project area. It is the recommendation of Blondo Consulting that a Phase I Cultural Resource Reconnaissance Survey be undertaken to identify previously unrecorded properties within the project area. Should properties be identified, evaluation should take place to determine if they are eligible for the National Register of Historic Places. Recommendations should be formulated in regards to eligible properties and project design to insure protection of significant cultural resources and completion of project.

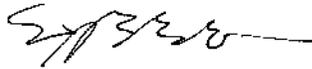
Although the project lies on private property, it is advised that Section 106 of the National Historic Preservation Act (Section 106) could still play an important part in the review of the proposed project. Section 106 is triggered by project (1) placement on federal land, (2) federal funding, (3) federal permitting. Section 106 is a cultural resource review process that does not prevent projects from being completed, but rather allows comment and input from interested parties (including but not limited to: SHPO, Advisory Council on Historic Preservation (ACHP), Tribes, and the public).

Typically, a privately funded wind farm project on private property may trigger Section 106 during environmental permitting. Nationwide or Individual permits from the Army Corps of Engineering for work near wetlands or stream crossings triggers Section 106. Development on land held in Conservation Reserve Program (CRP) or under a Farm Services Administration

(FSA) mortgage triggers Section 106 as both programs are administered and funded by the United States Department of Agricultural (USDA) who issue decisions and permits for project compatibility.

The key to Section 106 is early identification and frequent consultation with the lead federal agency (determined by what triggers Section 106). Avoidance of Section 106 can lead to delays or denial of federally issued permits. Section 106 is a process that can smoothly guide projects to success when “early and often” is enacted.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Blondo', with a horizontal line extending to the right.

Steven J. Blondo MA  
Blondo Consulting, LLC