

**Appendix G      Reports and Correspondence relating to Archeological  
and Historic Resources**



August 8, 2023

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

Re: Great River Energy - Pilot Knob to Burnsville Project  
Archaeological Overview

Dear Ms. Beimers:

This letter presents the results of a file search completed in support of the Pilot Knob to Burnsville Project (Project) in Dakota County, Minnesota. Great River Energy proposes to rebuild portions of its existing electrical transmission system in the area. As shown in the enclosed Aerial Maps, the Project will include rebuilding three sections of transmission line: (1) the line between the Pilot Knob and Deerwood substations (Aerial Map pages 1-10), (2) between the Deerwood and River Hills substations (Aerial Map pages 10-23), and (3) between the River Hills and Burnsville substations (Aerial Map pages 23-36). The Project would involve removal of existing poles and installing new poles generally following the existing centerline. Presently, the transmission system provides 69-kilovolt (kV) service; following the Project, the rebuilt line will be capable of providing 115-kV service to support growth and expansion in the Project area. A 115-kV transmission line requires wider clearances from trees for safety and reliability, and additional right-of way may be needed for the Project. The Project would also involve upgrades at the Burnsville Substation (Aerial Map page 36).

The Project will include replacing existing structures primary with direct-imbedded steel poles, 60-95 feet above ground and placed 350-400 feet apart. Specialty poles may be required in some areas, which will mean different size or type of poles and spans. The project will be built to Great River Energy's 115-kV design standards but will initially operate at 69-kV. Designing to 115-kV standards will allow the flexibility to operate the regional transmission system at 115-kV as future electrification and load development increases in the area. Great River Energy is proposing minor reroutes from the existing line at State Highway 35E<sup>1</sup> (Aerial Map pages 14-15) and at the Burnsville Substation (Aerial Map page 1); the old infrastructure would be removed along the existing route at these locations during the execution of this Project.

To assist with Project planning, Merjent, Inc. (Merjent) prepared this letter; it includes the results of a file search and recommendations and is not intended to replace a formal field survey. To

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<sup>1</sup> Great River Energy will be working with the Minnesota Department of Transportation and Dakota County to explore altering the alignment of the transmission line near the where Blackhawk Road crosses over State Highway 35E. The alignment would enable Great River Energy to conduct maintenance activities by accessing its right-of-way via Blackhawk Road rather than State Highway 35E.

adequately address resources that may be affected by Project improvements, a larger Study Area was created to establish context and understand nearby archaeological site density. The Study Area includes the Project Area plus an additional half mile buffer on each side of the centerline. The Study Area is comprised of the following locations:

County	Township	Range	Sections
Dakota	27N	23W	20, 21, 22, 27, 28, 29, 30, 31, 32, 33
Dakota	27N	24W	25, 26, 35, 36
Dakota	115N	20W	7, 8, 9, 16, 17, 18, 19, 20, 21

## REGULATORY FRAMEWORK

When Project development proceeds, we anticipate that the Minnesota Field Archaeology Act (Minn. Stat § 138.31-138.42) may apply to the Project. Regardless of specific permits required prior to construction, the Private Cemeteries Act (Minn. Stat § 307.08) will apply.

The Minnesota Field Archaeology Act (Minn. Stat § 138.32-138.42) establishes the Office of the State Archaeologist (OSA); requires licenses to engage in archaeology on nonfederal public land; establishes ownership, custody, and use of objects and data recovered during survey; and requires state agencies to submit development plans to the OSA, Minnesota State Historic Preservation Office (SHPO), and the Minnesota Indian Affairs Council for review when there are known or suspected archaeological sites in the area.

The United States Army Corps of Engineers (USACE) has jurisdiction for the placement of dredged or fill material in waters of the U.S. pursuant to Section 404 of the Clean Water Act (33 U.S.C. § 1344; 33 CFR Part 323). A Section 404 permit would be a federal action associated with the Undertaking that requires compliance with Section 106 of the NHPA and 36 CFR Part 800; this Project may require coverage under a Section 404 Regional General Permit. In addition, Appendix C of 33 CFR Part 325 contains the USACE procedures for the protection of historic properties to fulfill the requirements set forth in the NHPA and other applicable laws.

Minnesota's Private Cemeteries Act (Minn. Stat § 307.08) affords all human burial grounds and remains older than 50 years and located outside of platted or identified cemeteries protection from unauthorized disturbance. This statute applies to burials on either public or private lands or waters and includes prehistoric American Indian burial mounds as well as historic cemeteries.

## Literature Review

Merjent, Inc. (Merjent) on behalf of Great River Energy conducted a Phase IA Literature Review. On Friday, May 26, 2023, Merjent retrieved cultural resources site information (archaeological sites and historic structures) and previous survey files from the SHPO. Merjent Cultural Resource Specialists reviewed archaeological site files on the OSA online portal, as well as the General Land Office (GLO) maps and available historical aerial photography accessed online through the OSA Portal at <https://osa.gisdata.mn.gov/OSAportal>.

## BACKGROUND RESEARCH RESULTS

### Previously Recorded Archaeological Resources

No archaeological sites occur within a half mile of the Project. Two historic cemeteries were identified within one mile of the Project.

Site Number/Name	Site Type	Location (TRS)	NRHP Status
Christ Lutheran Cemetery	Cemetery	T27N R12W S29	Protected under Minn. Stat § 307.08
Mount Calvary Cemetery	Cemetery	T115N R20W S15	Protected under Minn. Stat § 307.08

According to the OSA files, two cemeteries are located within a half mile of the Project. The Christ Lutheran Cemetery is located on the north side of County Highway 32 / Cliff Road (see enclosed Topographic Map page 1). Additional online sources show that the Christ Lutheran Cemetery is located on the property of the Christ Lutheran Church, which is located north and west of the Project at the southwest corner of the intersection of Diffley Road and Beaver Dam Road. Aerial images show a cemetery plot immediately south of the church, bordered by trees on the east, south, and west. This cemetery is 0.21 mile west of the Project where the alignment follows Blackhawk Rd. Several roads, buildings, and a small lake provide a buffer between Project activities and the cemetery.

St. John's Cemetery is located at the northeast corner of the intersection of Blackhawk Rd and Diffley Rd (see enclosed Topographic Map page 1). It is a small cemetery bordered on the north and east with a chain-link fence. According to Google Street View, Project components do not overlap these borders. The Project is located on the west side of Blackhawk Rd, and crosses to the east side of Blackhawk Rd immediately north of St. John's Cemetery. Additionally, Google Street View shows a wide bike lane between the ROW and the cemetery. All Project activities will take place within this ROW. At this location, the replacement line will generally follow the route of the existing line, therefore a pole may be located immediately northeast of St. John's Cemetery, but not within the cemetery. However, some tree clearing will likely be required within the cemetery boundaries. Given the close proximity to the cemetery, Merjent recommends a qualified archaeologist monitor construction activity at this pole location.

### Previously Recorded Archaeological Surveys

The Study Area falls mostly within **Low Site Potential/Well Surveyed** layers of the Mn Model (Phase 4) Survey Implementation Model. The presence of waterbodies is often used as an indicator of high site probability in an area, and many of the sites discussed above are located near the Minnesota River. However, there is considerable distance from these sites to where Project activities will take place. Additionally, given that the Project is a rebuild project within an existing ROW, which is also collocated with existing roads, it is unlikely that the Project area contains intact cultural deposits.

### Previously Recorded Standing Historic Buildings and Structures

Five historic buildings and structures are located within the Study Area, one of which intersects the Project. All of these resources are currently considered unevaluated for the NRHP. The Project crosses Trunk Highway 77 (XX-ROD-028) at its intersection with County Highway 32 / Cliff Road (see enclosed Topographic Map page 2). The work in this area will consist of replacement along the same route as the existing line, and the replacement line will not result in an appreciable change to viewshed.

One site (DK-EGC-017) was formerly located less than a half mile from the transmission line, however it has since been moved and is no longer located at its original location (see enclosed Topographic Map page 1). Because it has been moved, it is possible that it is now not eligible for inclusion in the NRHP per criteria consideration B (36 CFR 60.4). Two sites (DK-BVC-001 and DK-BVC-002) (Topographic Map page 2) have been razed and are no longer extant. Because these sites have been razed, they are no longer eligible for inclusion in the NRHP per criteria consideration B (36 CFR 60.4).

The remaining building (DK-BVC-006) is a single dwelling located 250 feet east of the Project where it follows south on Highway 11 (Topographic Map page 2). According to Google Street View, this site is not visible from the Project ROW due to a wooded area and modern apartment complex. Due to these physical barriers, construction activities will not impact site DK-BVC-006. Additionally, because this is a replacement Project, there will not be an appreciable change to viewshed and the eligibility of site DK-BVC-006 will not be impacted.

Following Appendix B of the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (September 2004), the proposed area of potential effect (APE) for visual effects is a half mile radius for structures 200 feet or less in overall height. Therefore, structures more than a half mile from the proposed projects will not be subject to visual or indirect effects.

Site Number/Name	Site Type	Location (TRS)	NRHP Recommendation
DK-BVC-001/Connelly Farmhouse (razed)	Farmstead	T27N R24W S26	Unevaluated
DK-BVC-002/Kennelly Farmstead (razed)	Farmstead	T27N R24W S25	Unevaluated
DK-BVC-006	Single Dwelling	T27N R24W S36	Unevaluated
DK-EGC-017/ Eagan Town Hall (moved)	Governmental	T27N R23W S22	Unevaluated
XX-ROD-028/TH 36 (including TH 77)	Road-related	T27N R23W S18 and 19	Unevaluated

### General Land Office and Aerial Photo Review

Merjent reviewed Nineteenth century GLO maps and notes on file with the Bureau of Land Management (BLM 2023). The GLO map of the Project area illustrated conditions in 1870 as being largely prairie with the Minnesota River and associated floodplains and wetlands, as well as Fort Snelling. No cultural features are present on the GLO map of the Project area. Proximity

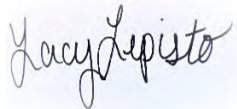
to water is an indication of high site potential. Aerial photographs from 1940 show the presence of established roads and farmsteads in the area. Subsequent historic and modern aerial photographs show that the landscape of the Project area has been heavily developed, and roads and infrastructure have been expanded extensively since the 1940s.

### **SUMMARY AND RECOMMENDATIONS**

No conventional archaeological sites were identified within the Study Area. Two cemeteries and two historic buildings were identified within the Study Area. There is potential for Historic-era sites within the Project Area because the area has been inhabited at least since the 1930s; however, given that the Project is an overhead transmission line rebuild project within an already disturbed utility ROW, and within a heavily disturbed and relatively recently developed and dynamic urban landscape subject to continual change, there is a low potential for intact historic sites. Based on the information obtained through the background research and given that the work is a rebuild project and there is low potential for intact sites, it is recommended that no survey is needed in advance of construction. Merjent does recommend that a qualified archaeologist monitor the construction activity at the pole location northeast of St. John's Cemetery. If human remains are encountered during construction activities, all ground disturbing activity must cease, and local law enforcement must be notified per MN 307.08.

If you have any questions about this memorandum, please do not hesitate to contact me (lacy.lepisto@merjent.com).

Sincerely,  
Merjent, Inc.



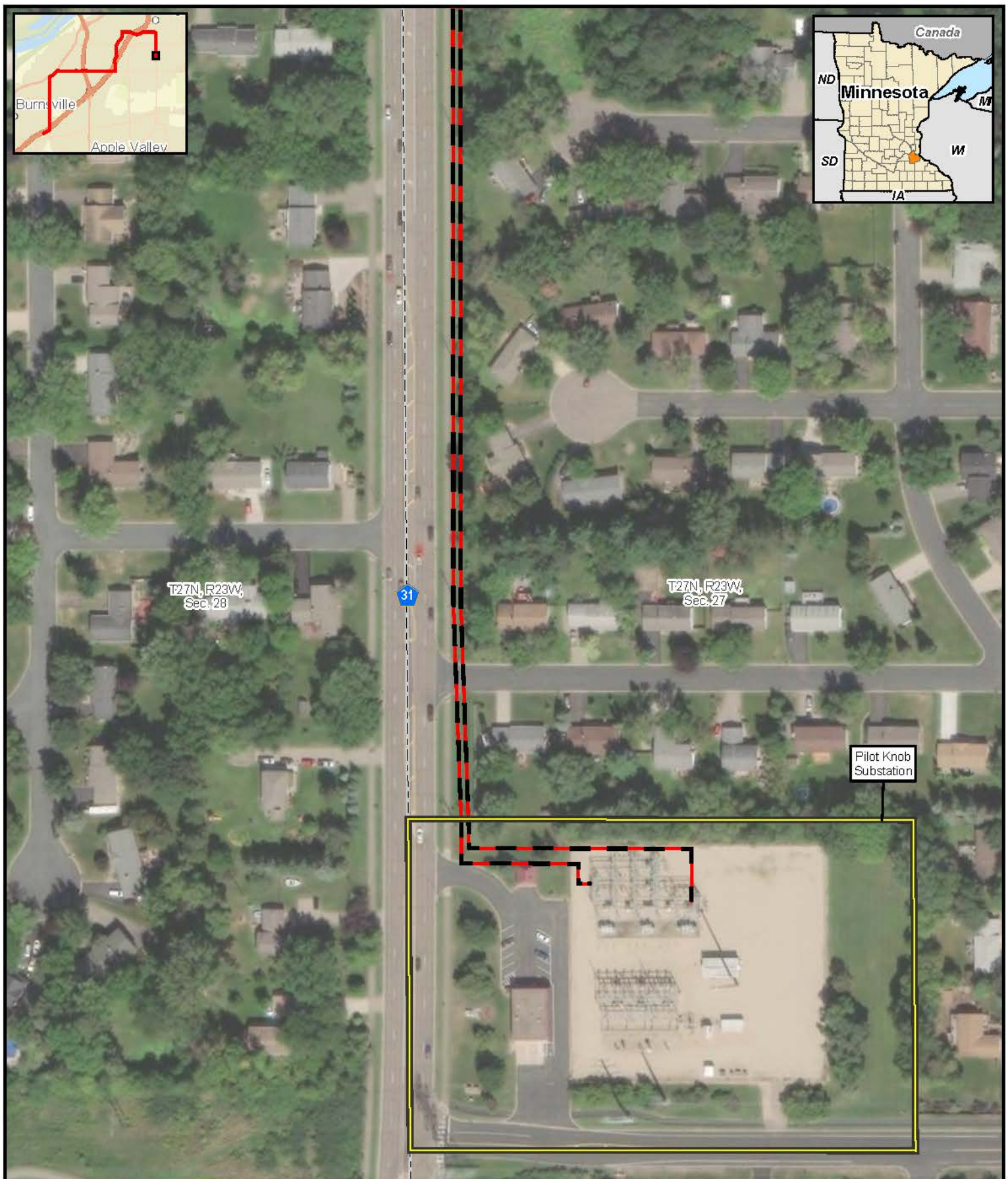
Lacy Lepisto  
Cultural Resource Specialist

Enclosures: Pilot Knob Project Aerial Maps  
Pilot Knob Project Topographic Maps

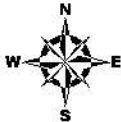
CC: Mark Strofhus, Great River Energy  
Britta Bergland, Merjent  
Kristin Lenz, Merjent

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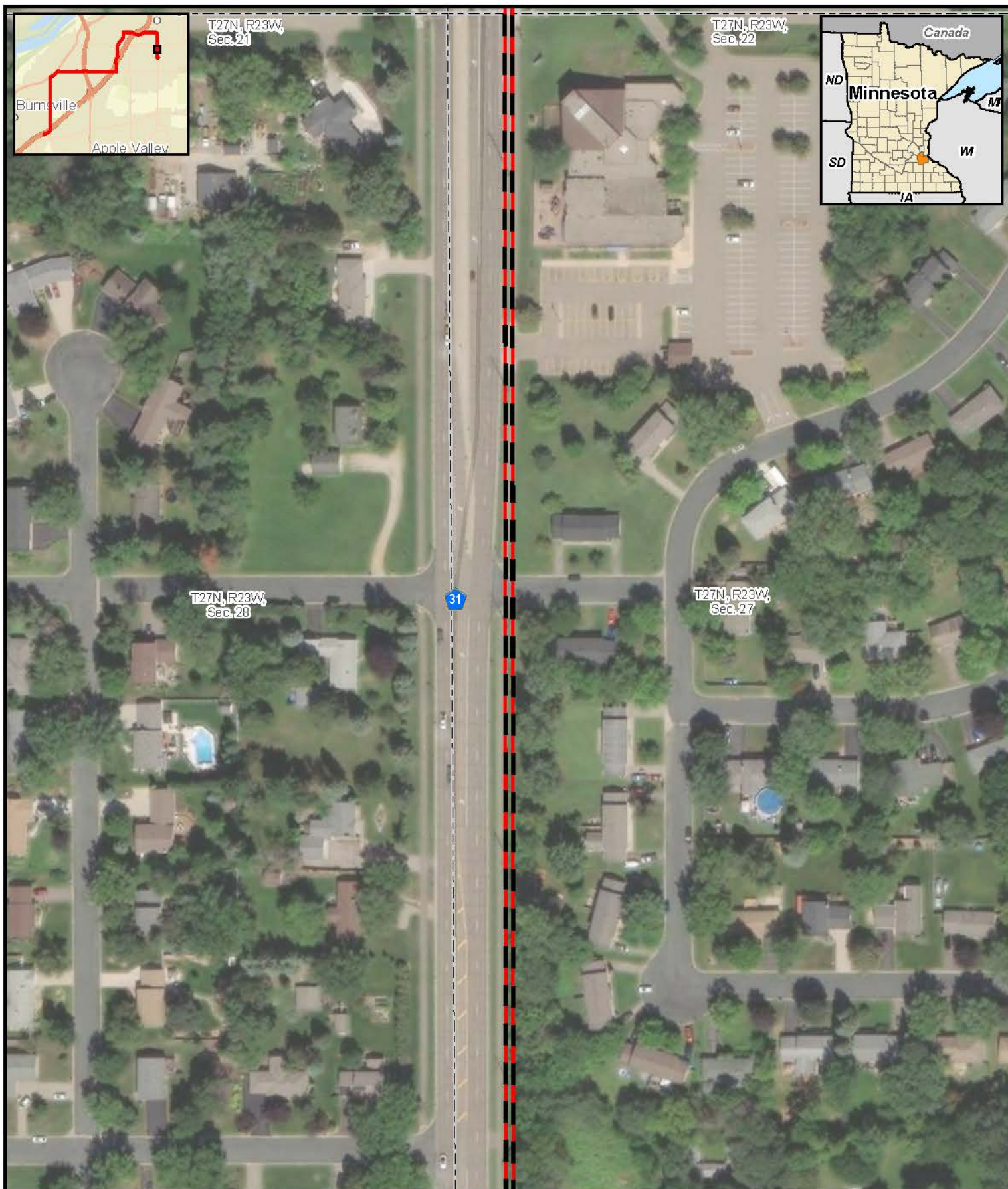
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 1 of 36**

**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

- Substation
- Section Boundary







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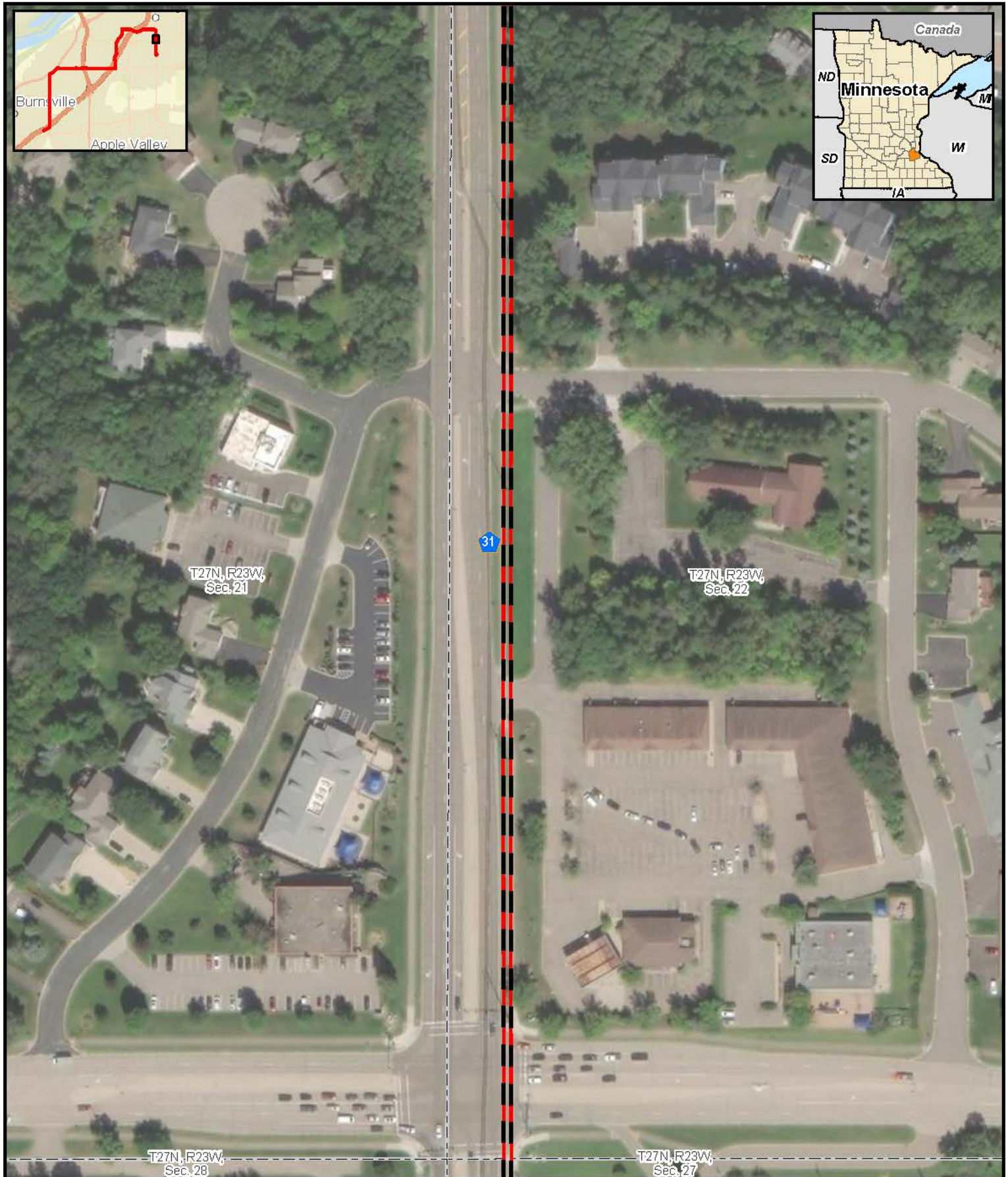
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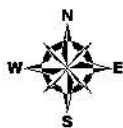
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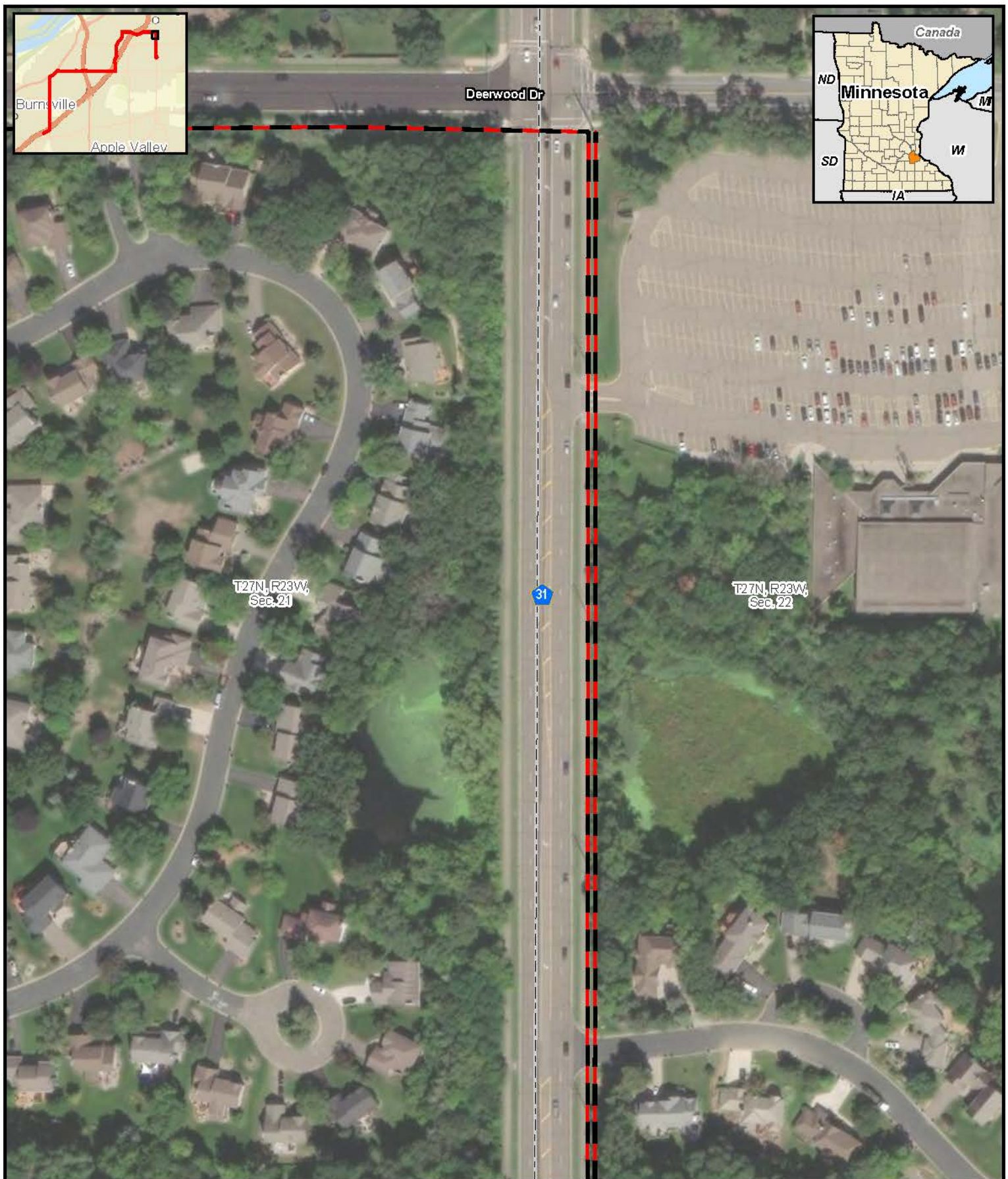
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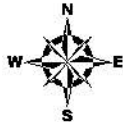
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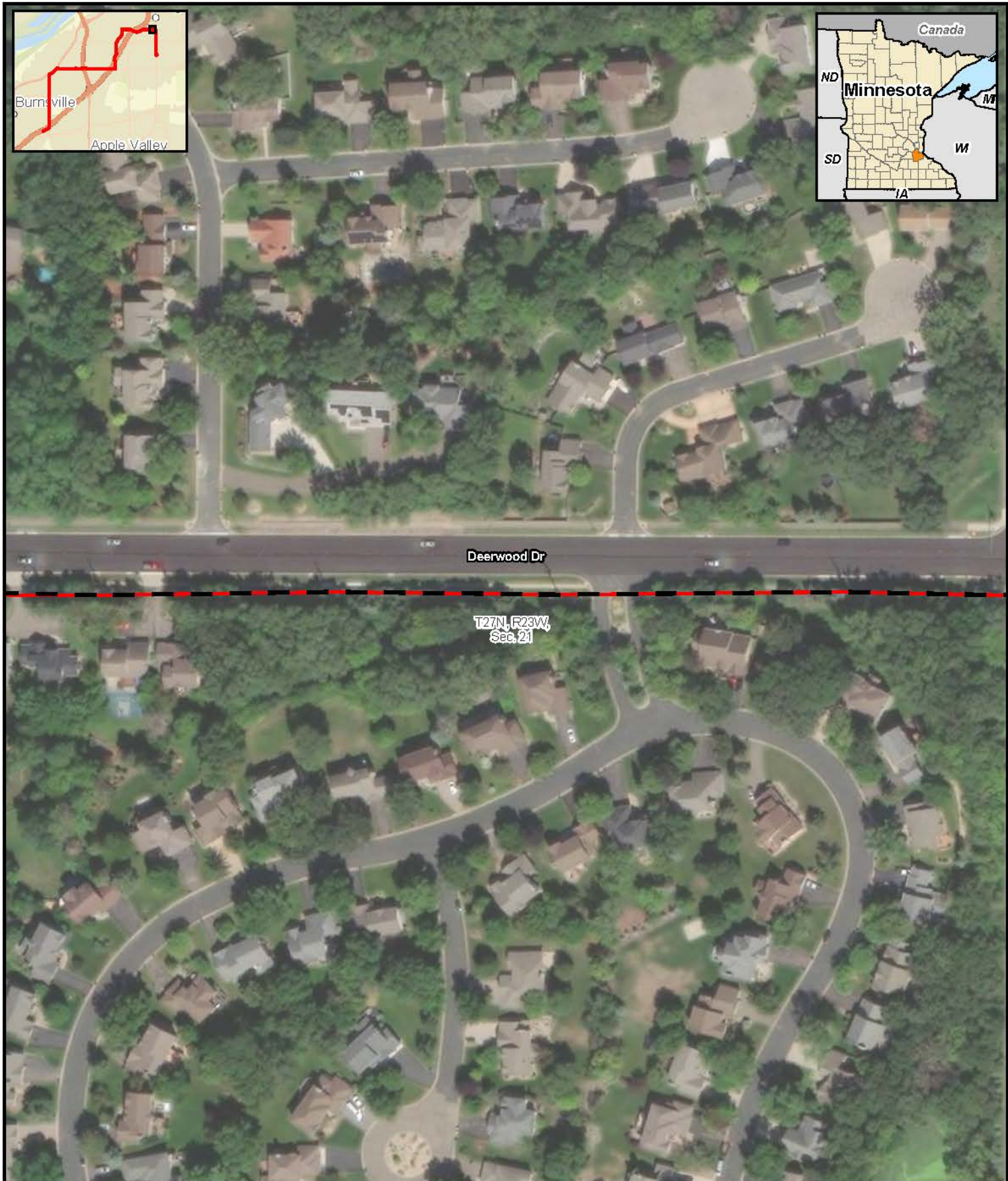
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**Page 4 of 36**

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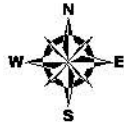
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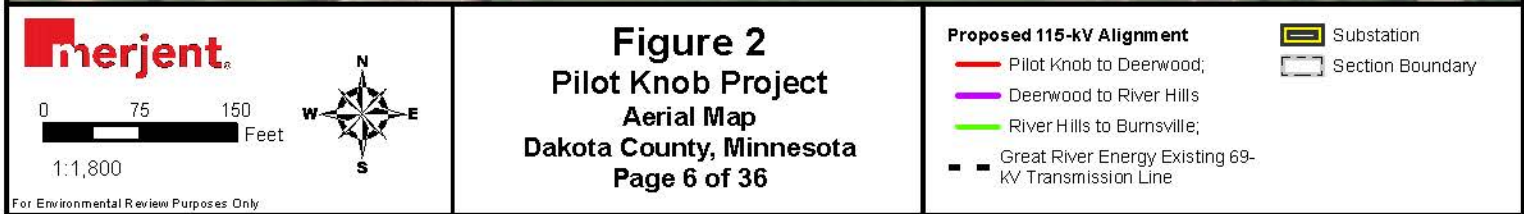
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**Page 5 of 36**

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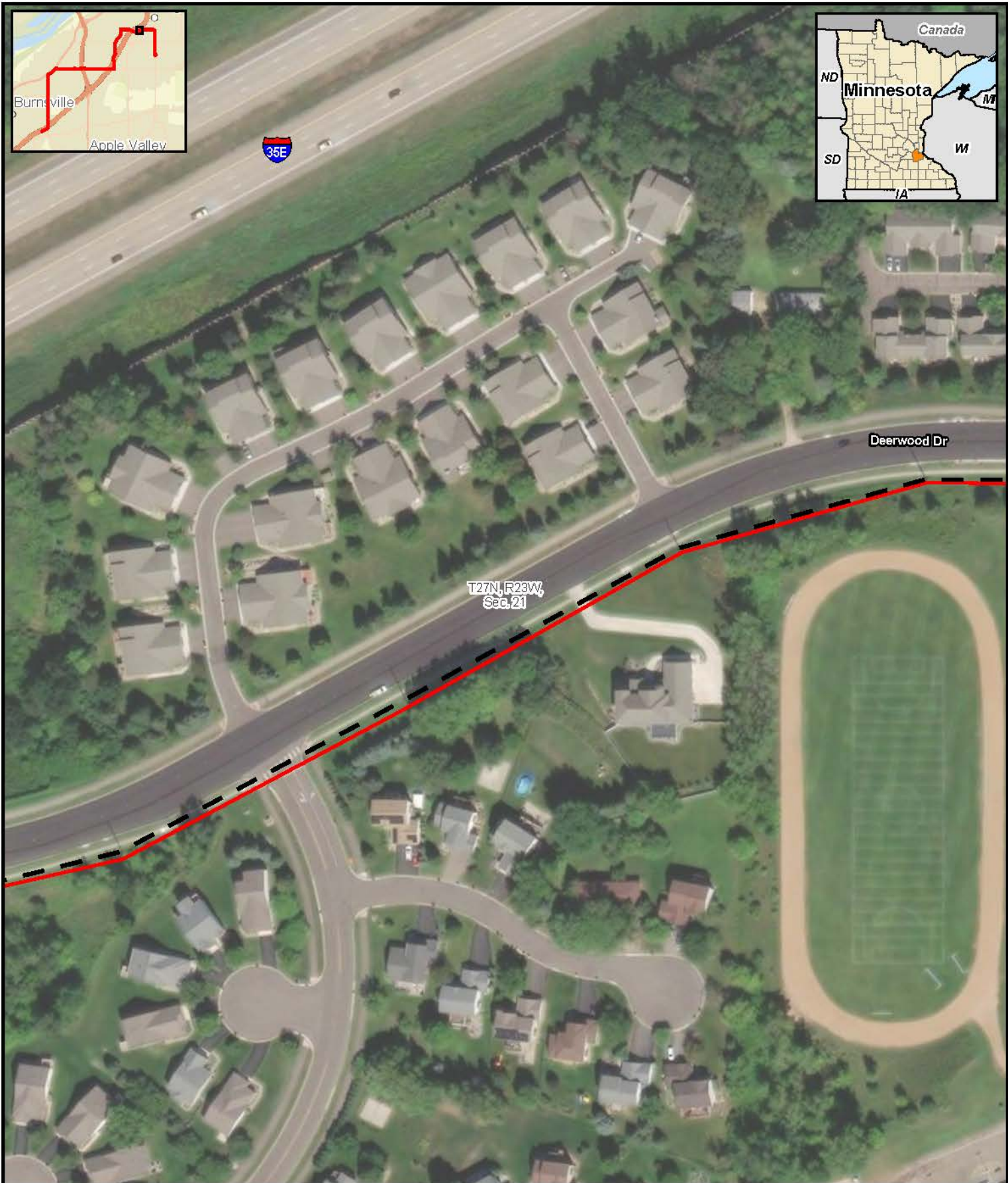
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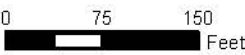



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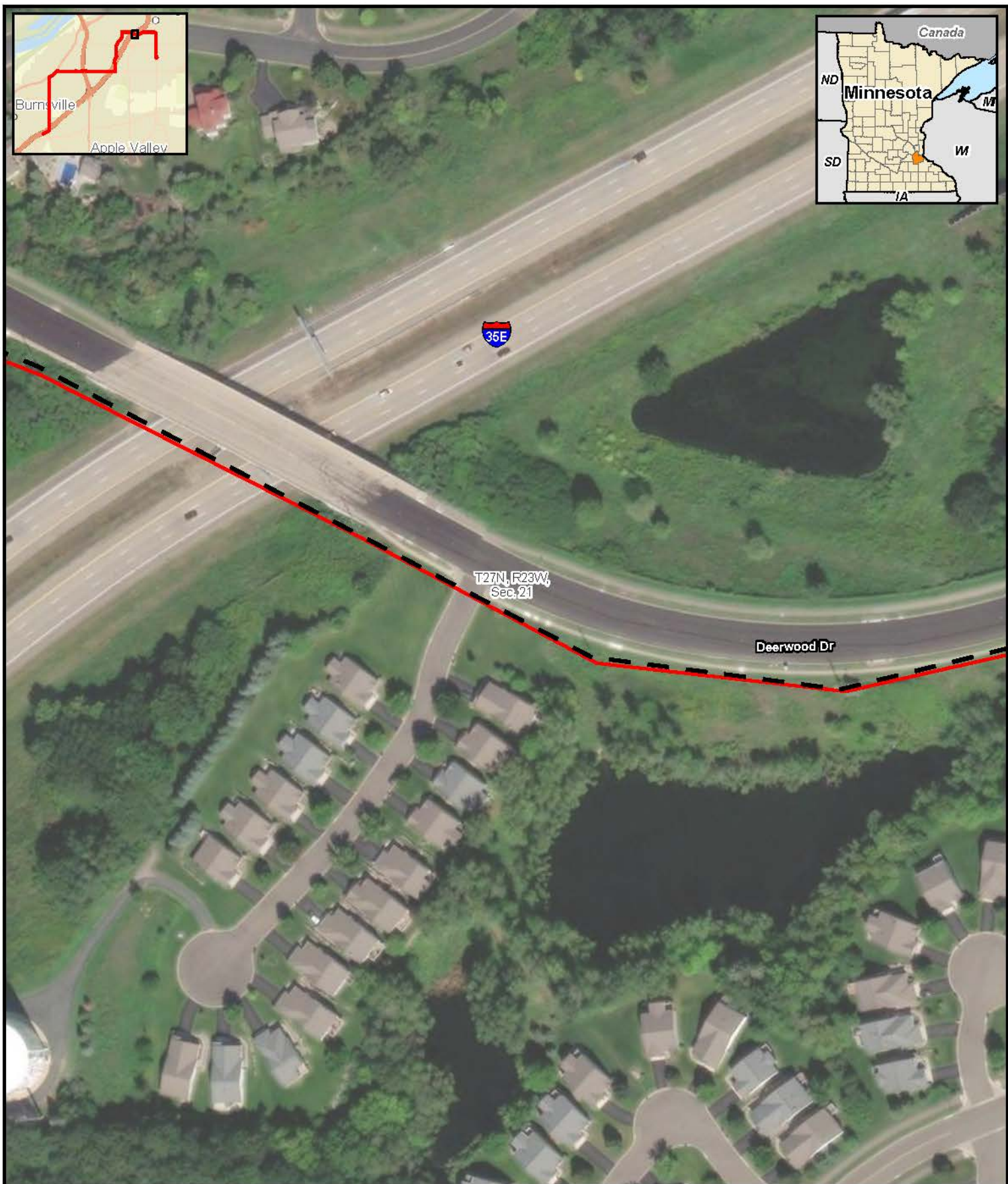



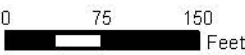







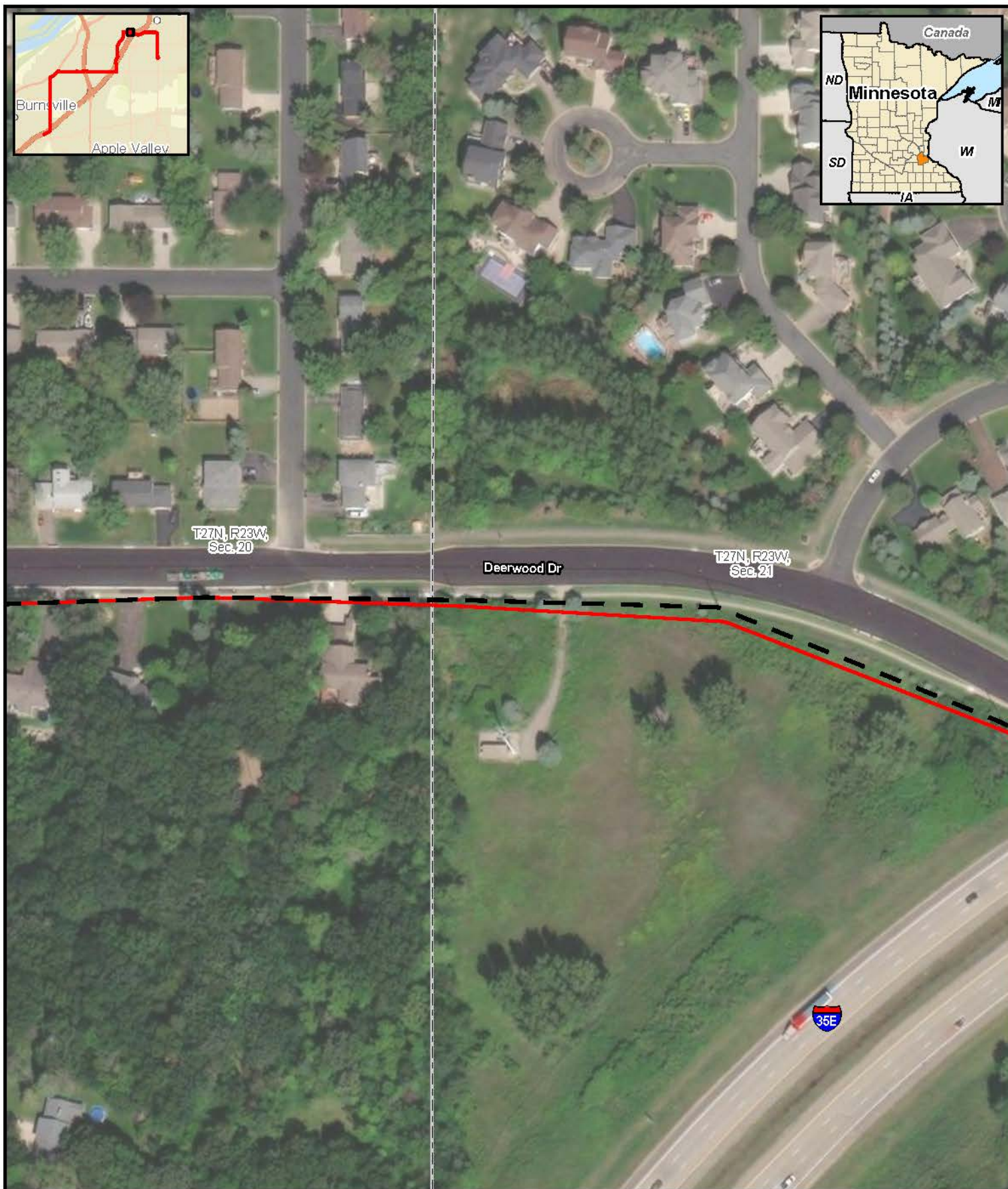
  1:1,800  For Environmental Review Purposes Only	<h2>Figure 2</h2> <h3>Pilot Knob Project</h3> <h4>Aerial Map</h4> <h4>Dakota County, Minnesota</h4> <p>Page 7 of 36</p>	<p><b>Proposed 115-kV Alignment</b></p> <ul style="list-style-type: none"> <li><span style="color: red;">—</span> Pilot Knob to Deerwood;</li> <li><span style="color: purple;">—</span> Deerwood to River Hills</li> <li><span style="color: green;">—</span> River Hills to Burnsville;</li> <li><span style="color: black;">- - -</span> Great River Energy Existing 69-kV Transmission Line</li> </ul> <div style="display: flex; justify-content: space-between; align-items: center;"> <div>  Substation   Section Boundary </div> <div style="text-align: right;"> <small>       Dated: 7/23/2020        Source: </small> </div> </div>
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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 9 of 36**

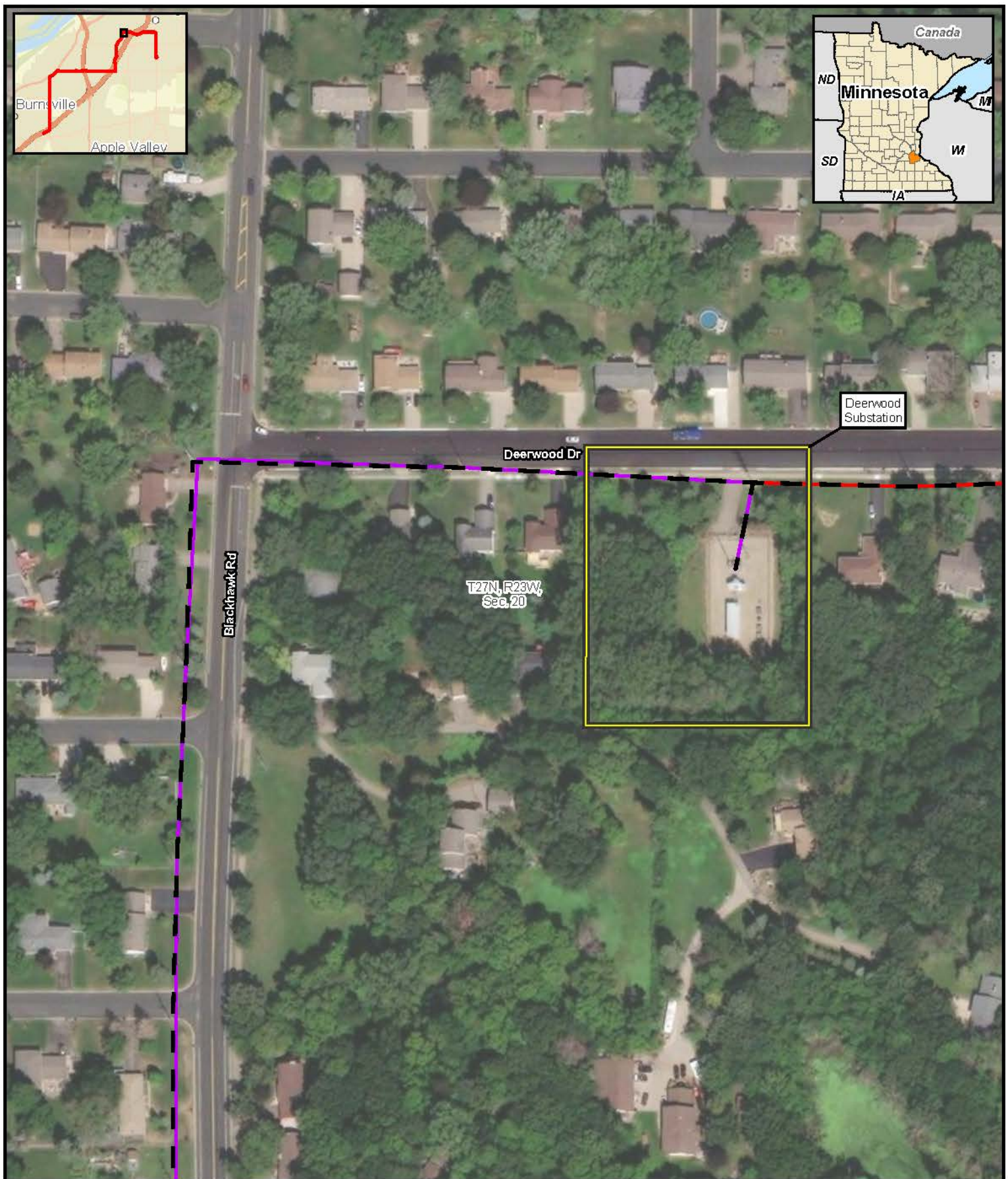
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**Legend**

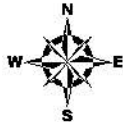
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**Page 10 of 36**

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### Figure 2

#### Pilot Knob Project

#### Aerial Map

#### Dakota County, Minnesota

Page 11 of 36

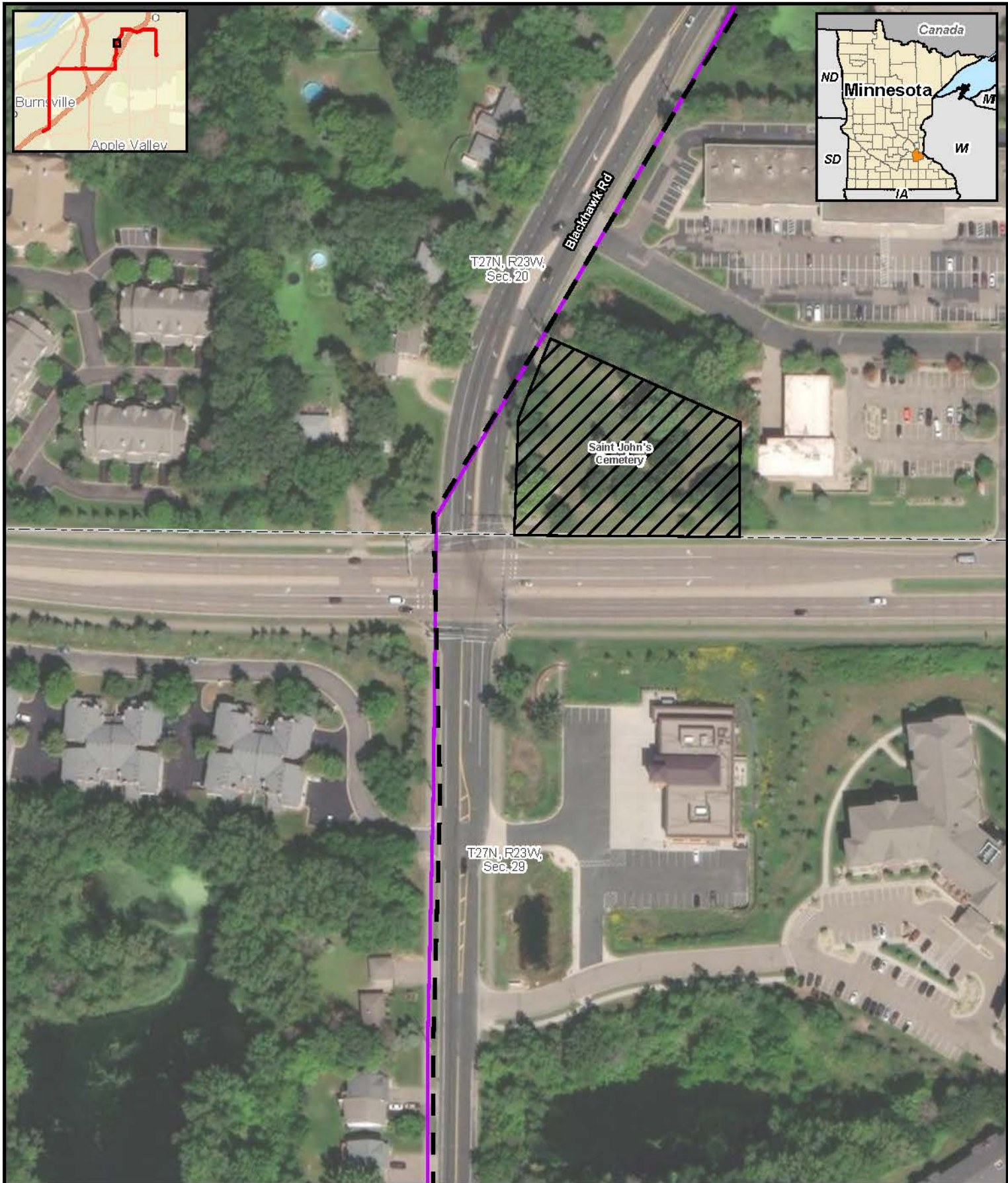
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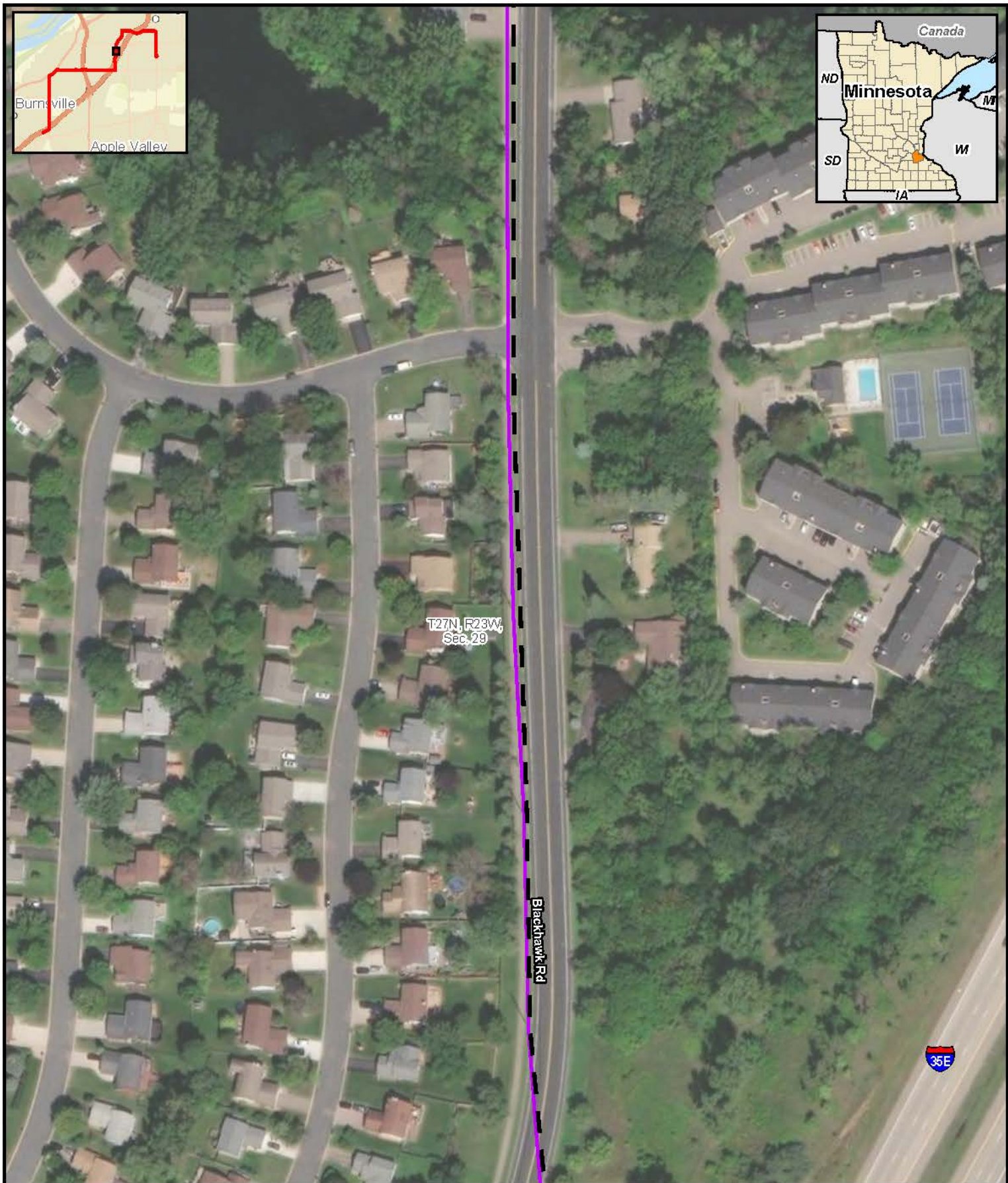
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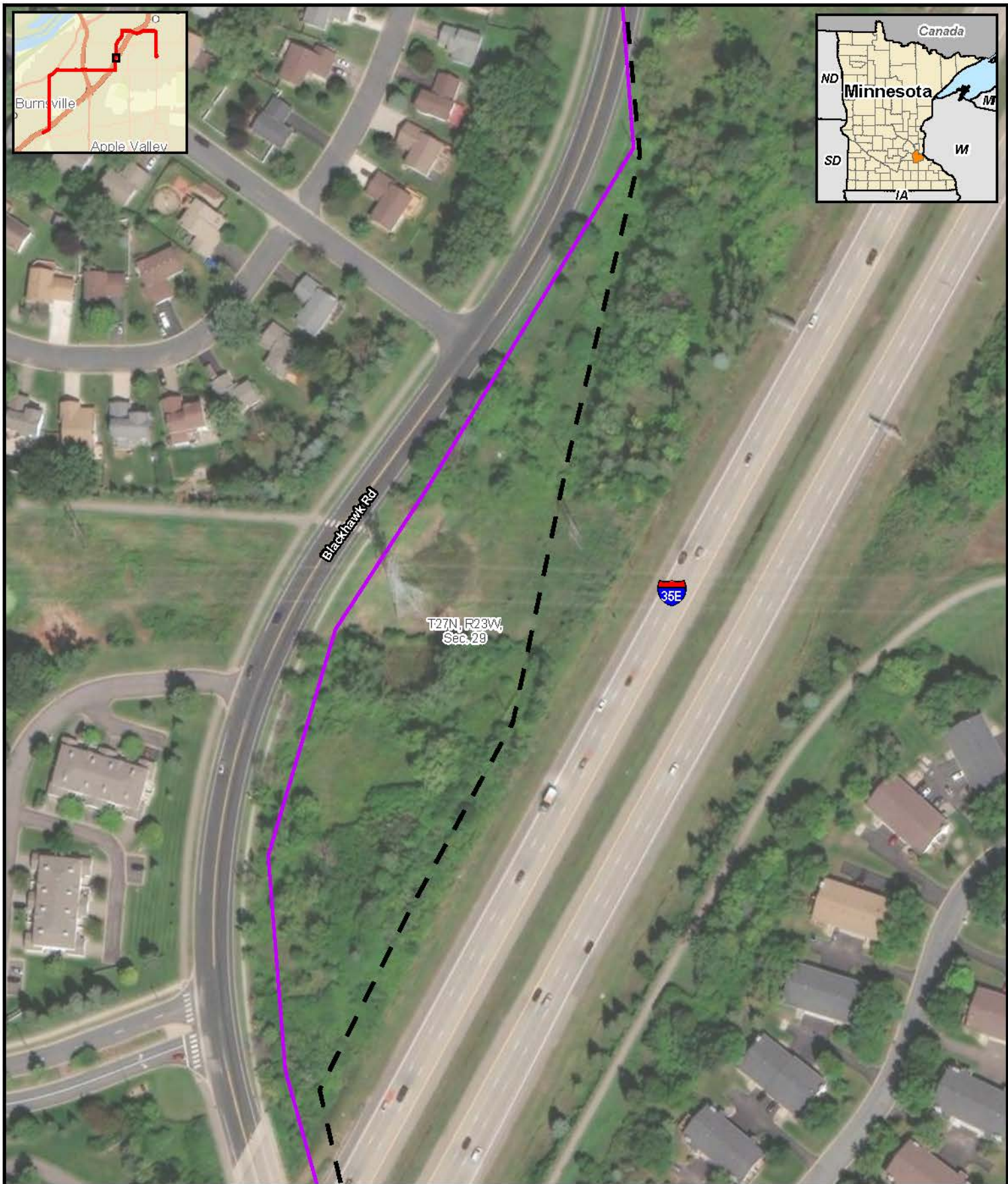
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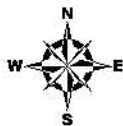


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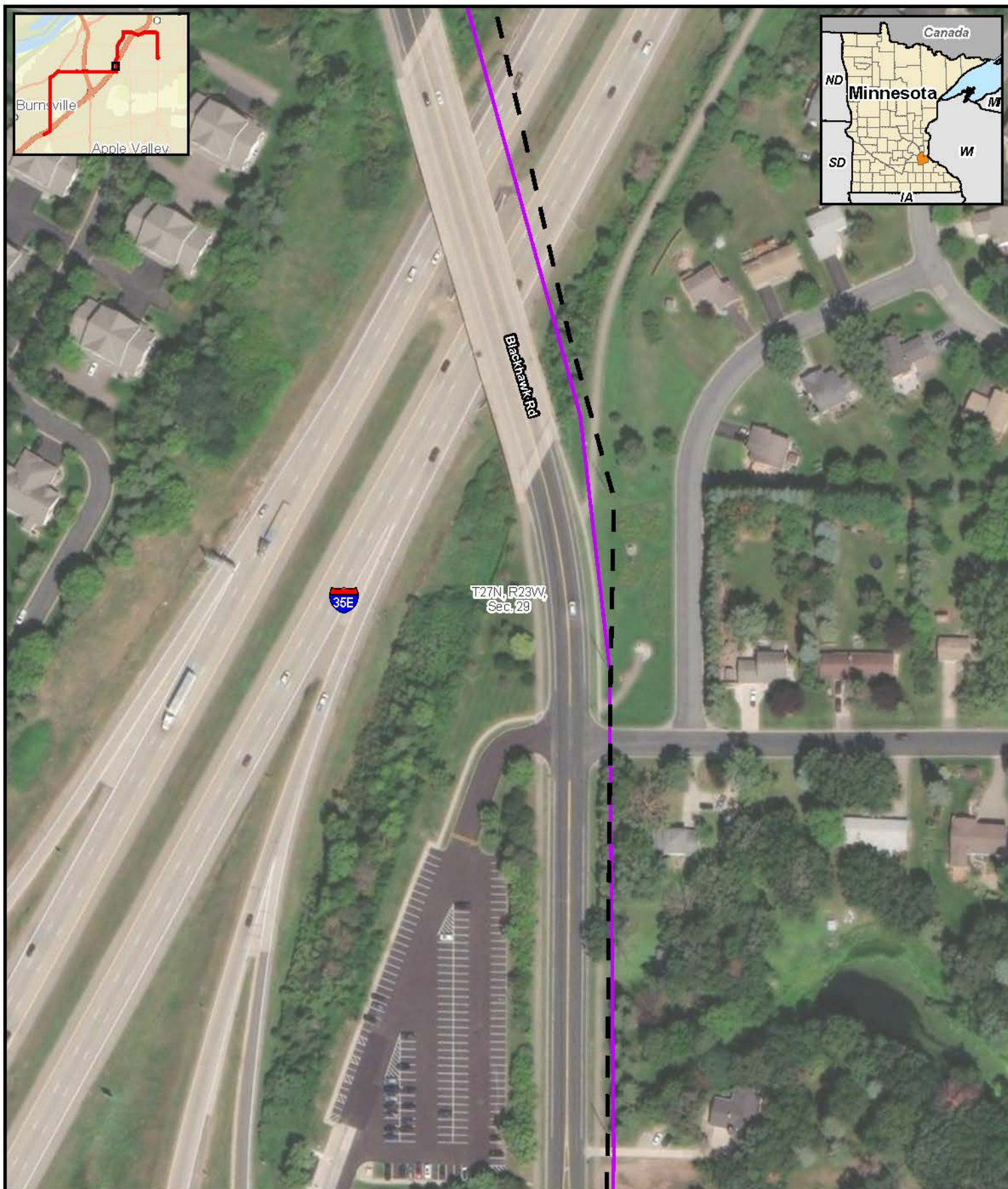
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**Page 14 of 36**

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**Page 15 of 36**

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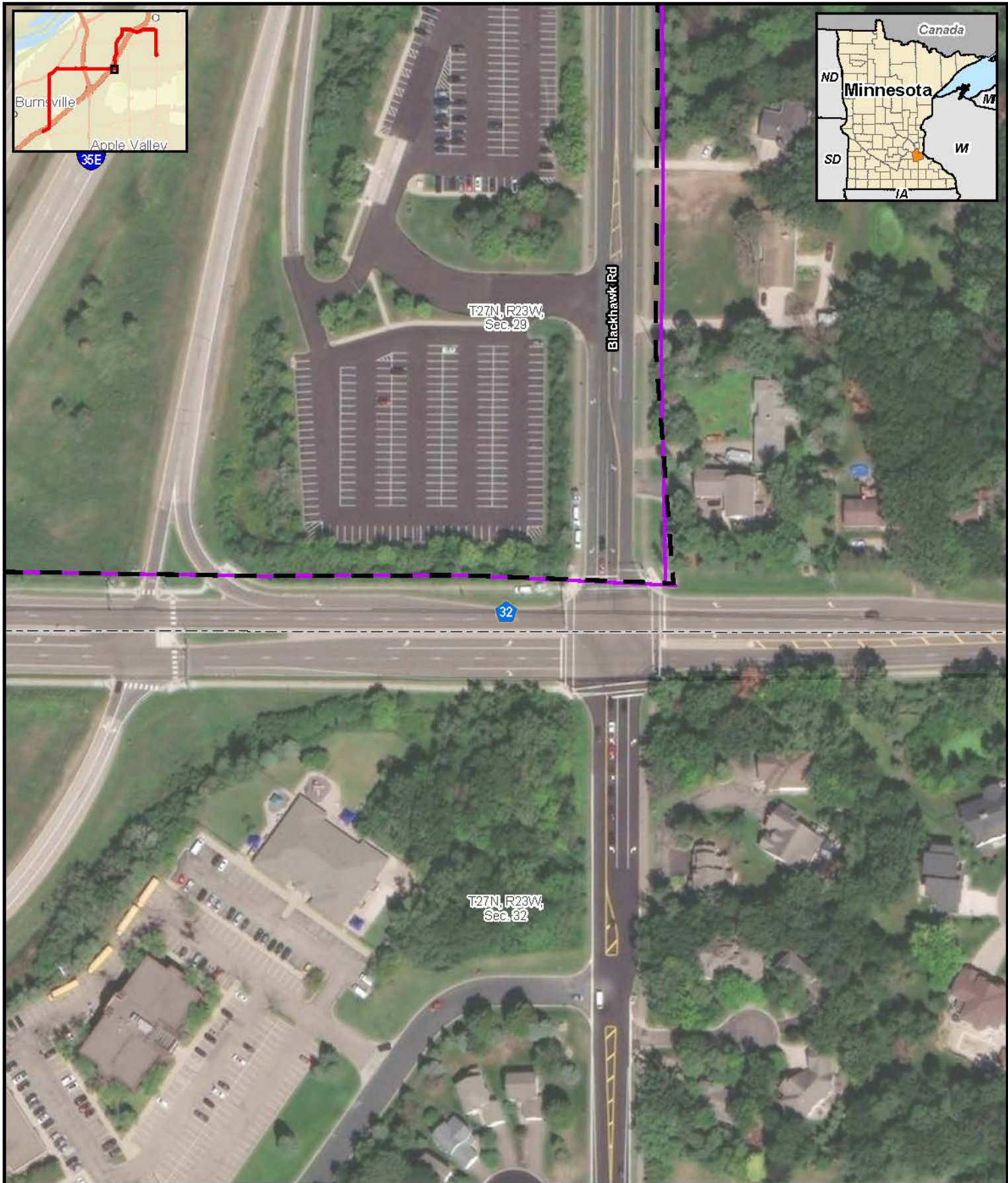
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**Legend**

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**Figure 2**  
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**Page 16 of 36**

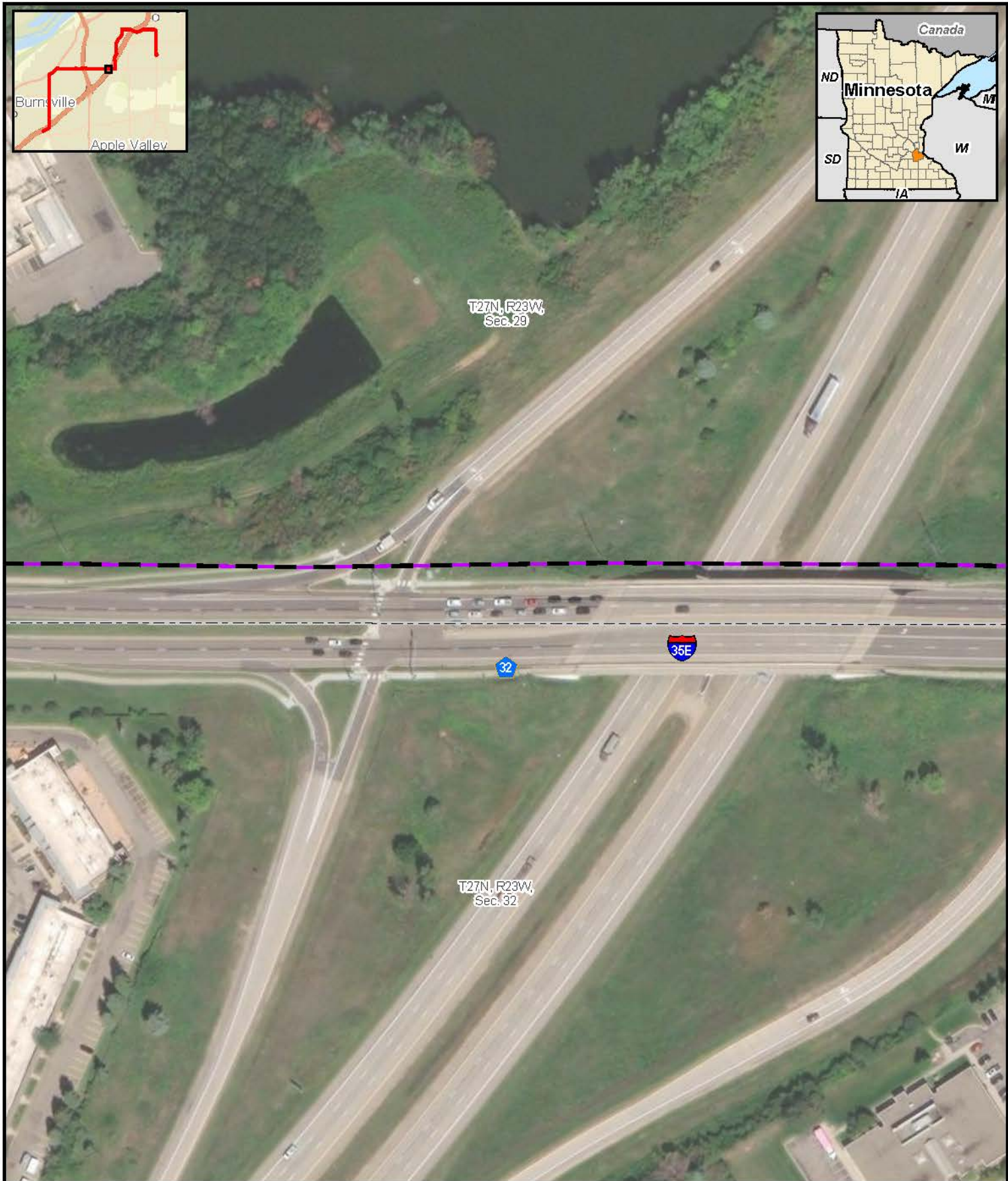
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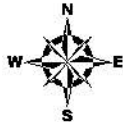
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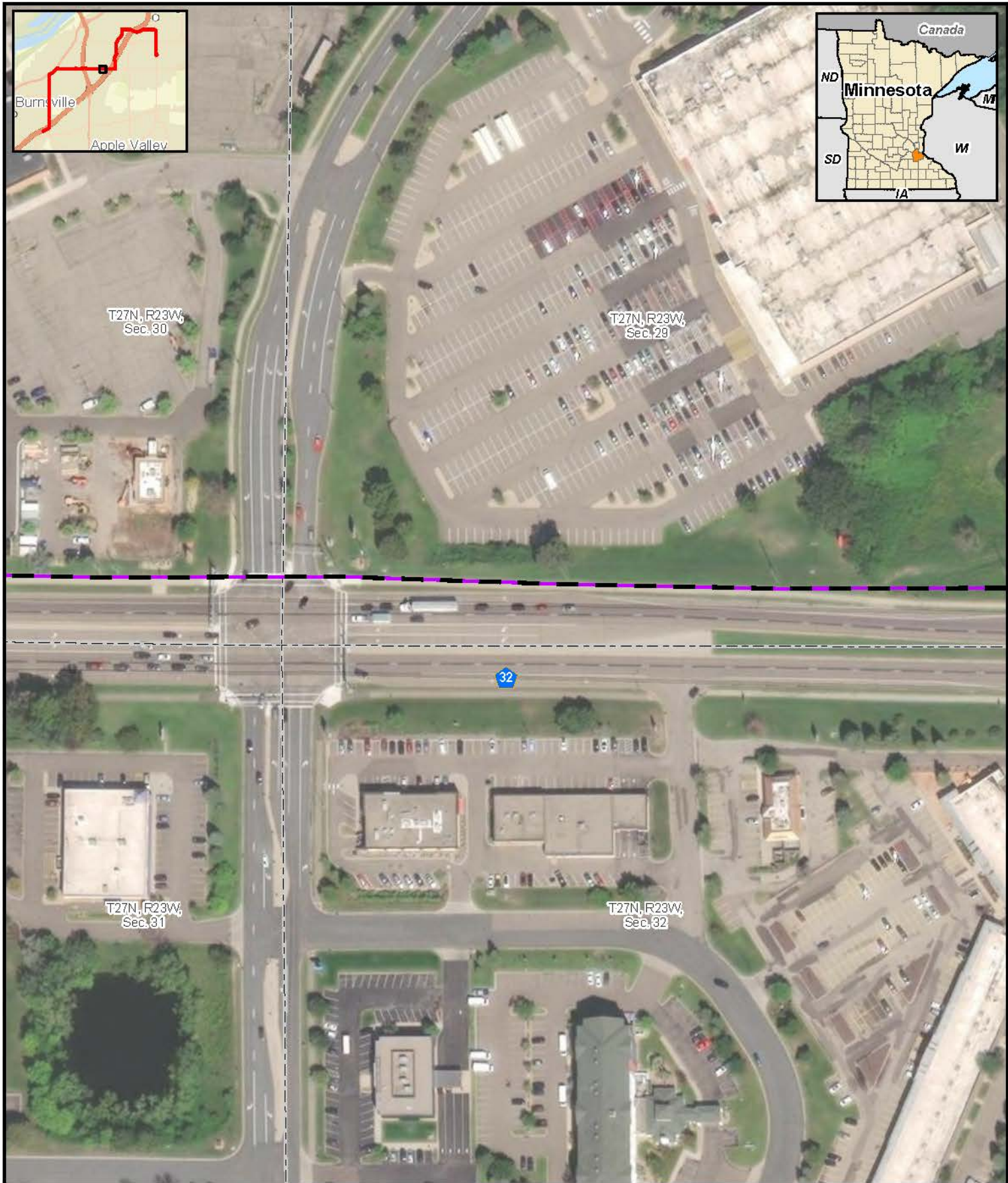
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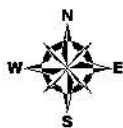
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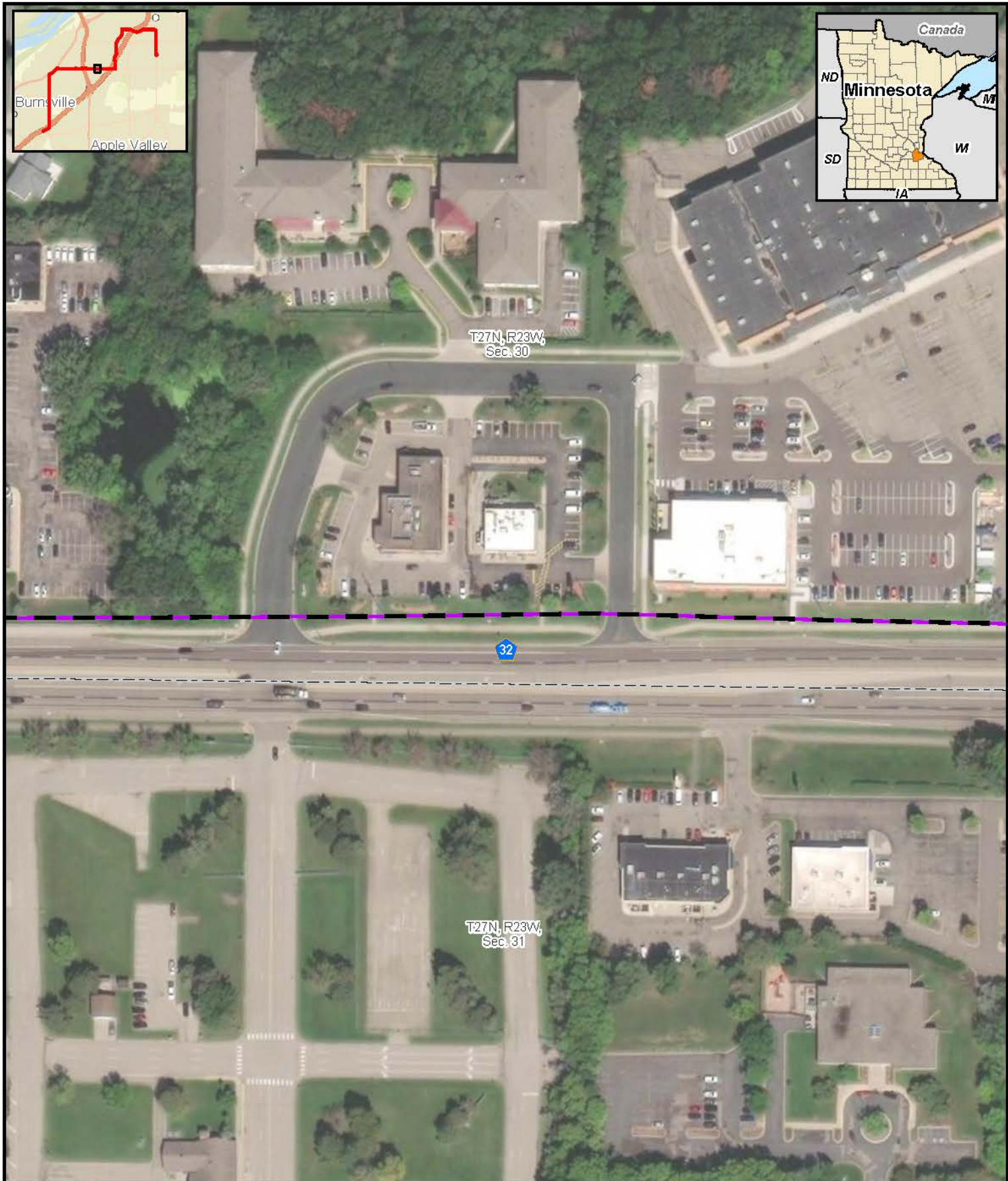
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**Page 18 of 36**

**Proposed 115-kV Alignment**

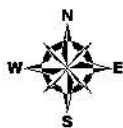
- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

- Substation
- Section Boundary






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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 19 of 36**

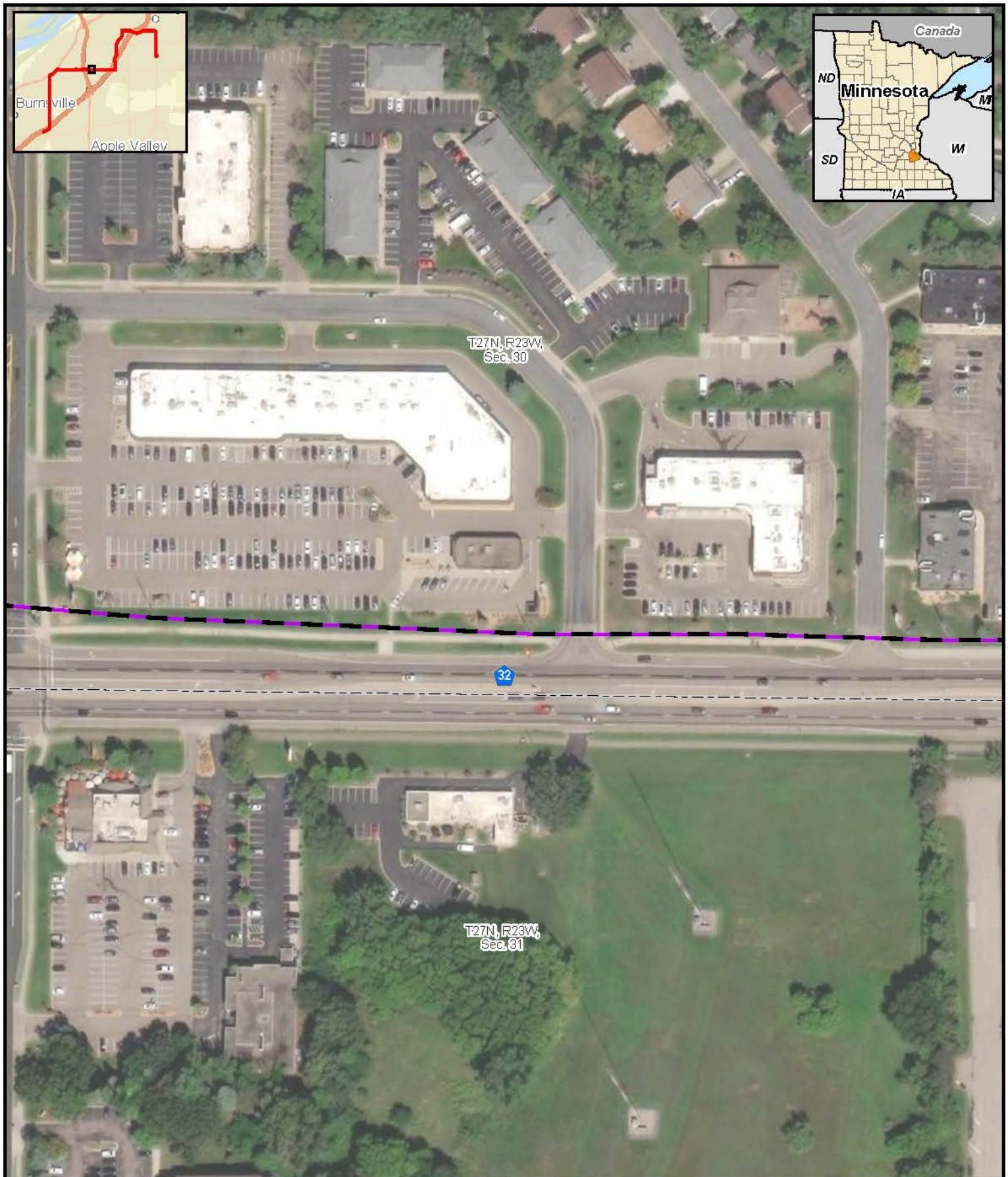
**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

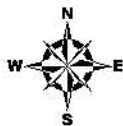
 Substation

 Section Boundary





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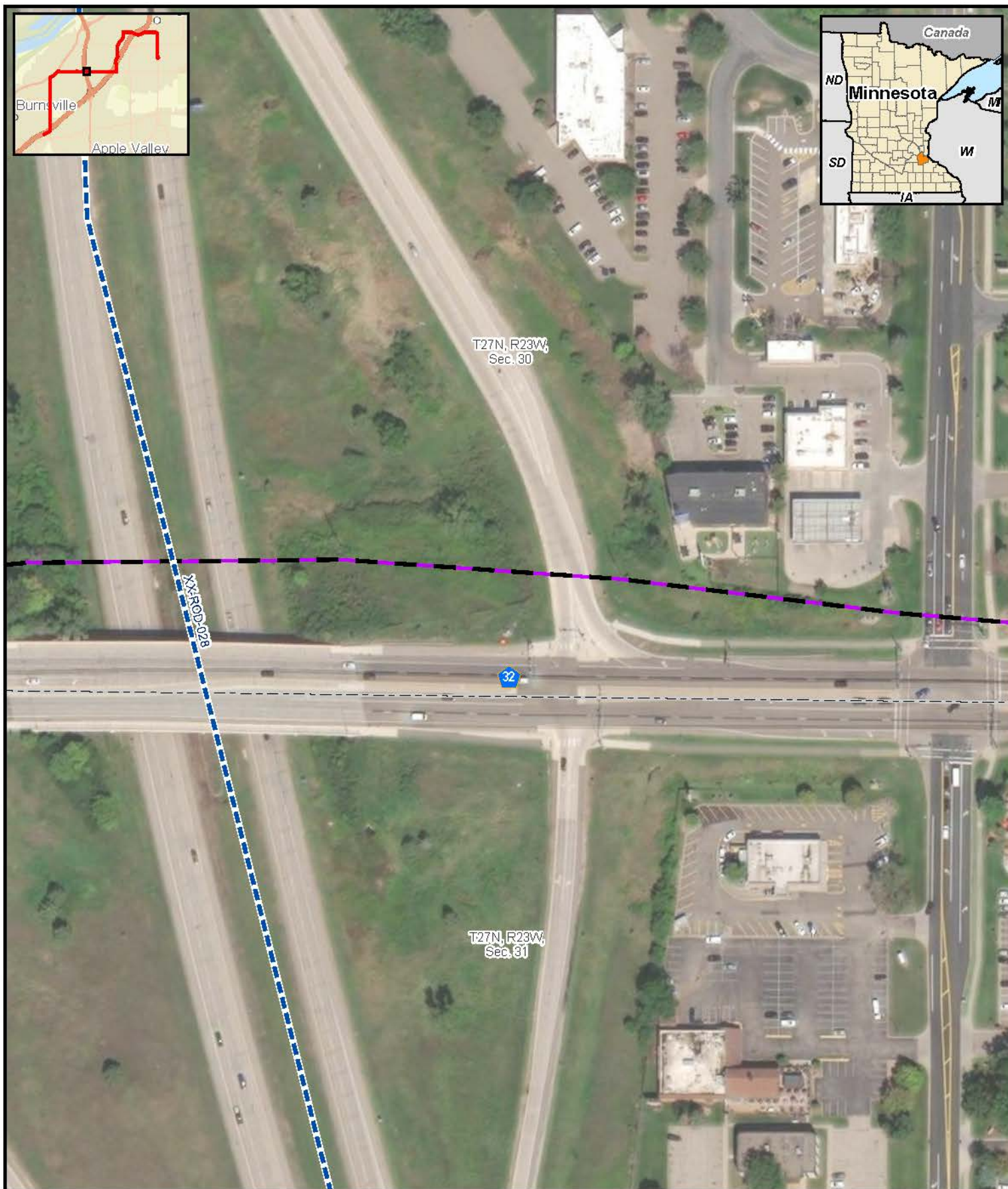
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 20 of 36**

**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- - - Great River Energy Existing 69-kV Transmission Line

- Substation
- Section Boundary





**merjent**

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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 21 of 36**

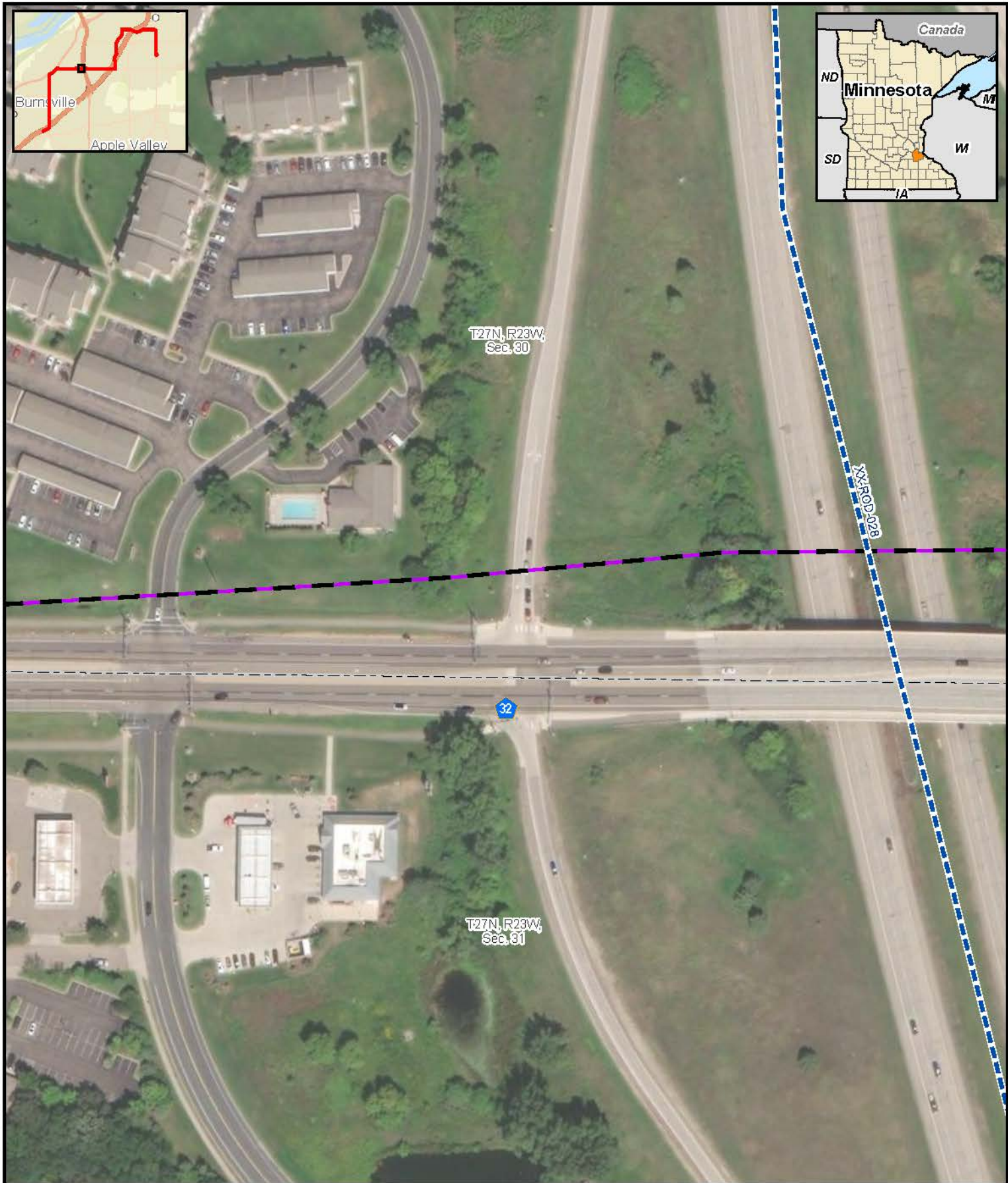
**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

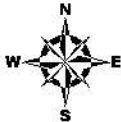
**Legend**

- Substation
- Historic Site
- Section Boundary





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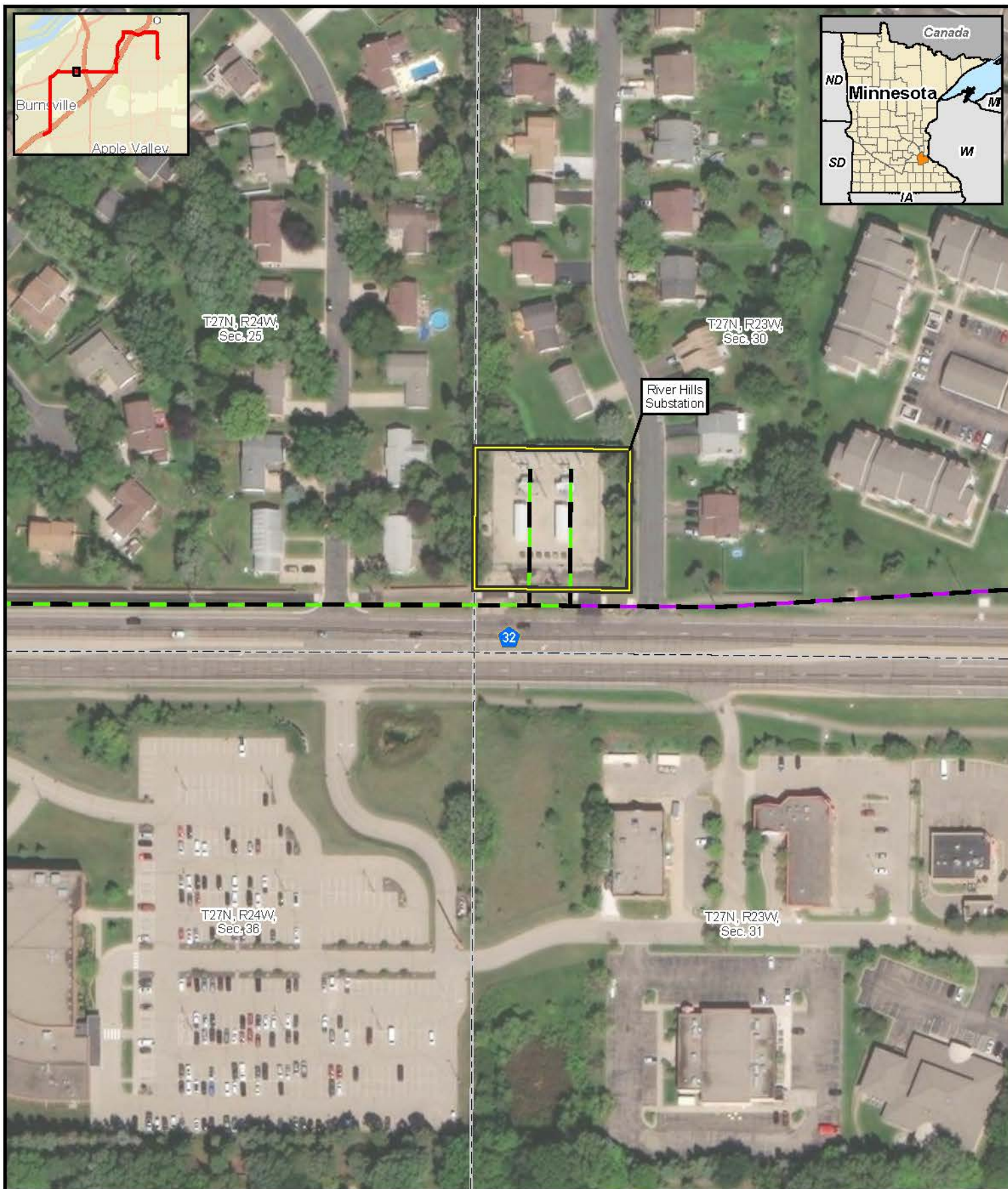
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 22 of 36**


**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

- Substation
- - - Historic Site
- Section Boundary








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## Figure 2

### Pilot Knob Project


#### Aerial Map


#### Dakota County, Minnesota

Page 23 of 36

**Proposed 115-kV Alignment**

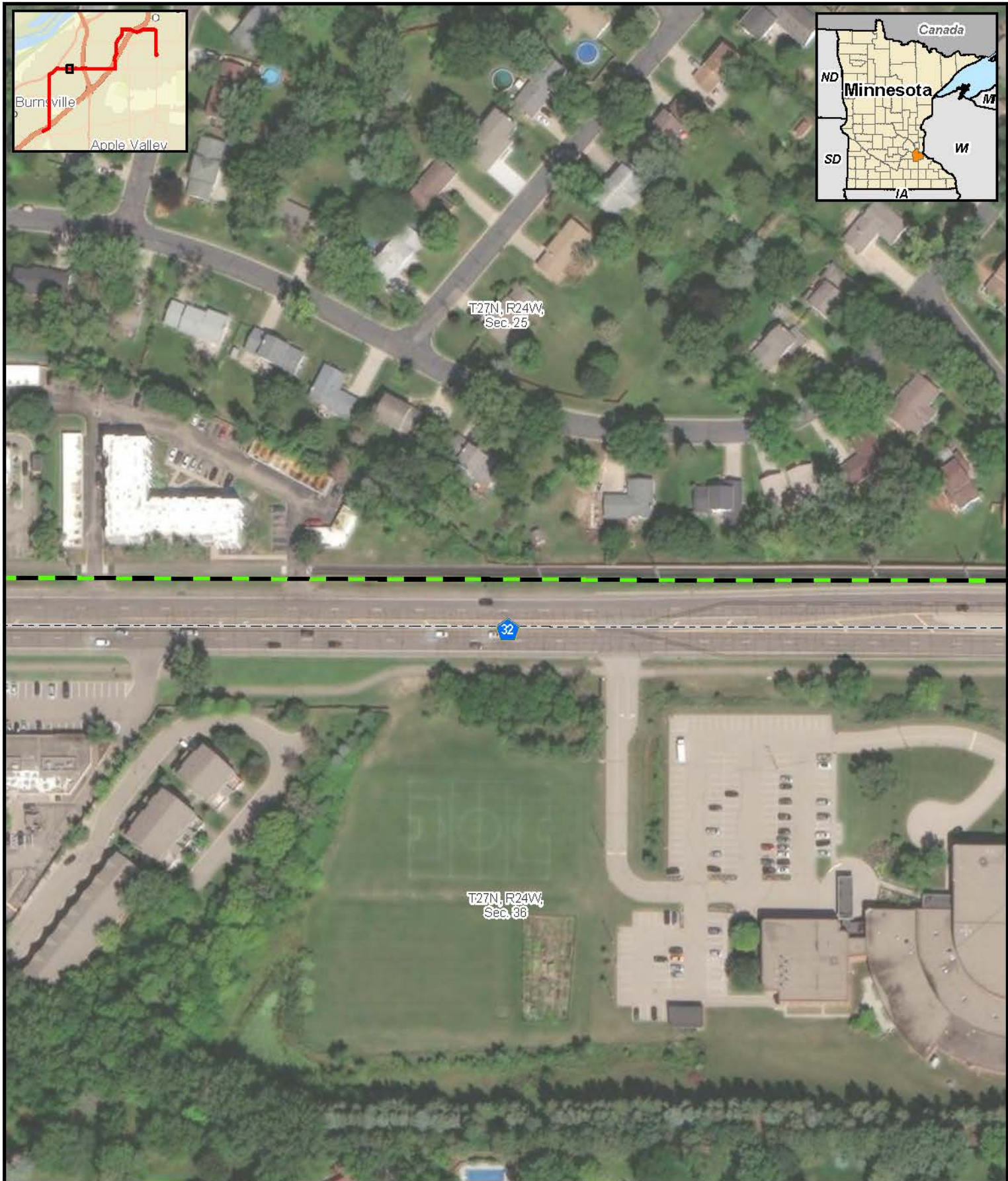
- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- - - Great River Energy Existing 69-kV Transmission Line

 Substation

 Section Boundary

Date: 7/23/2020 Source:



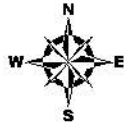


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Sec. 25

T27N, R24W,  
Sec. 36



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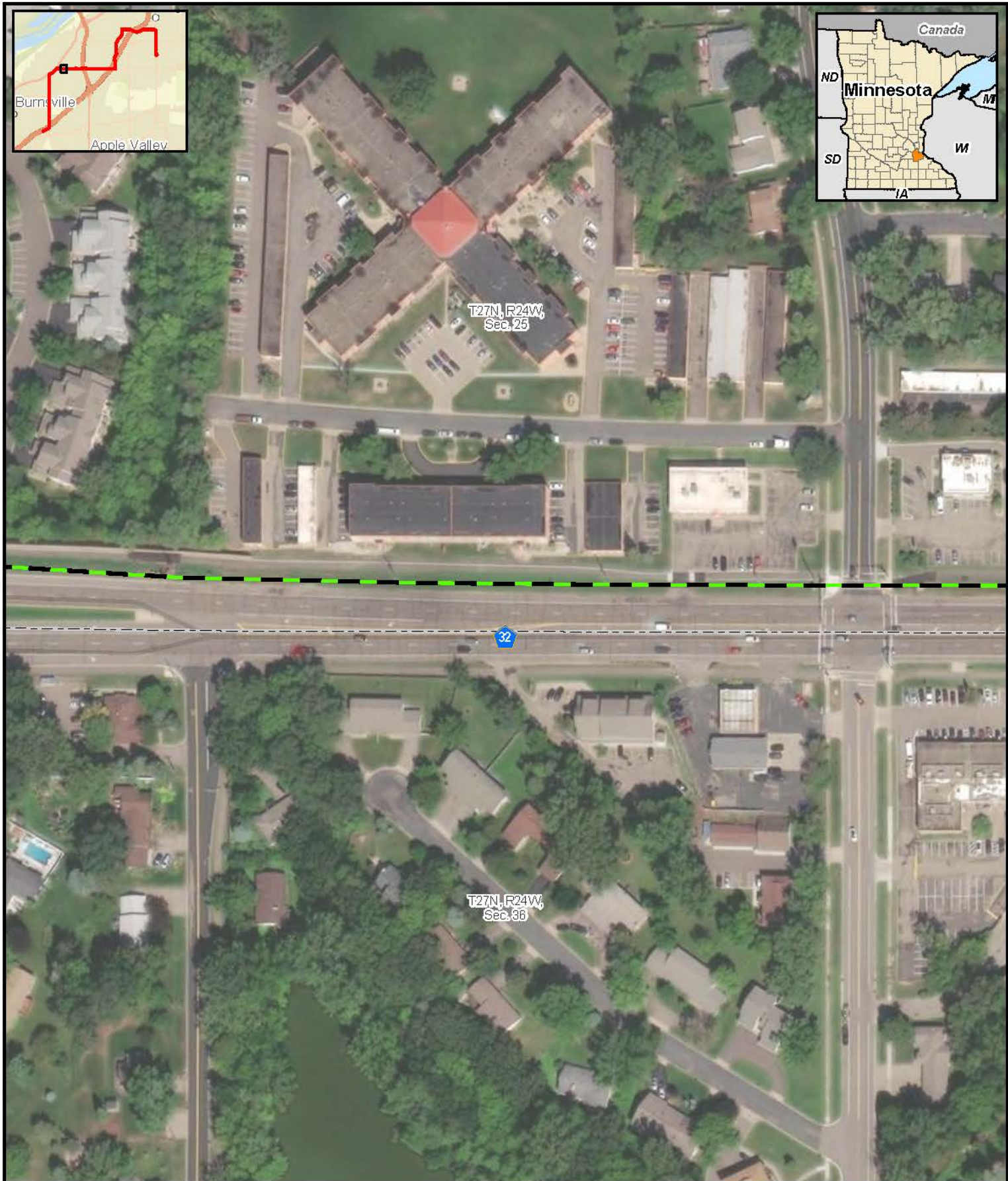
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 24 of 36**

**Proposed 115-kV Alignment**

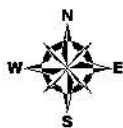
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- Substation
- Section Boundary





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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 25 of 36**

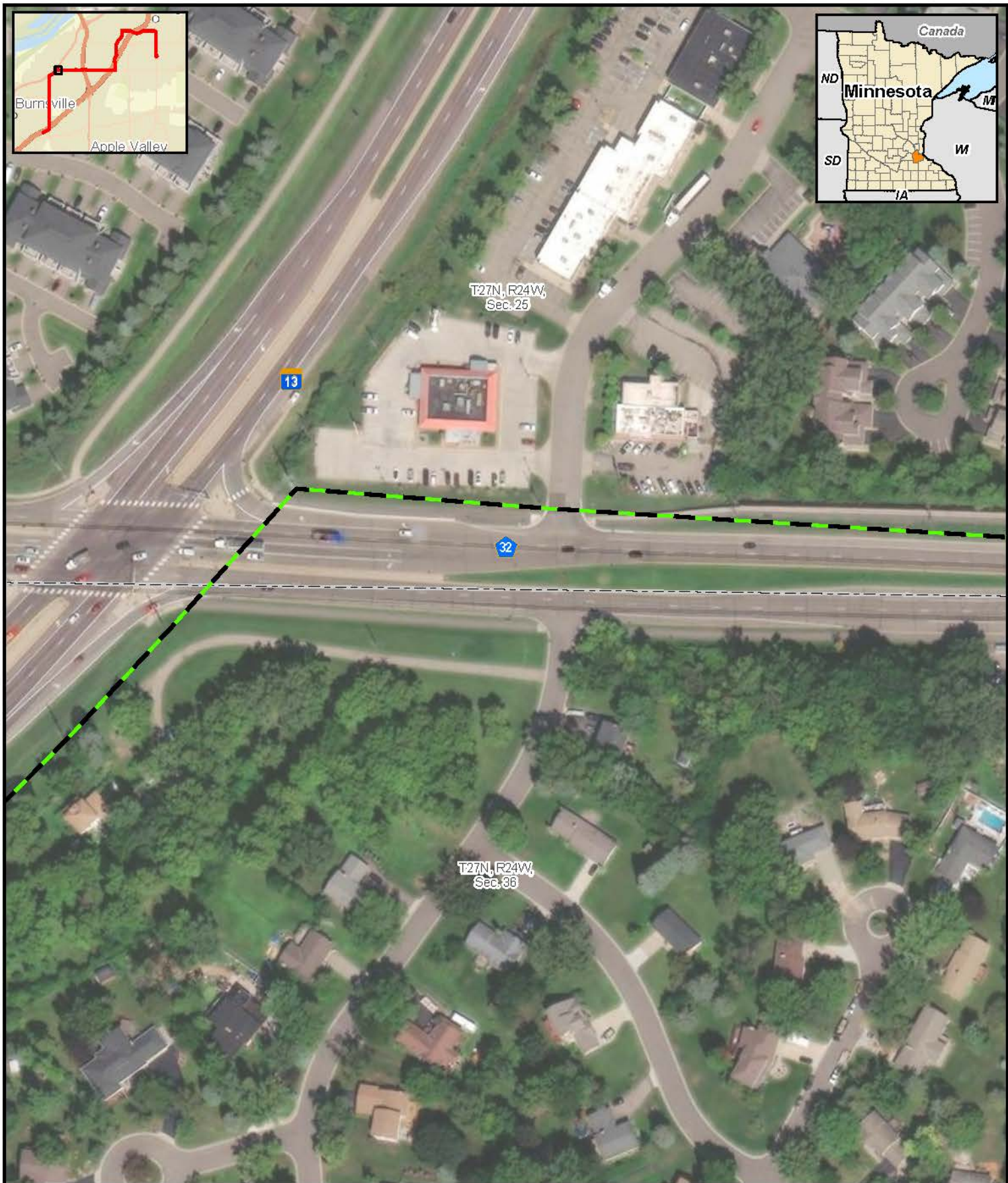
**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

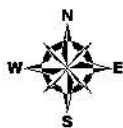
Substation

Section Boundary





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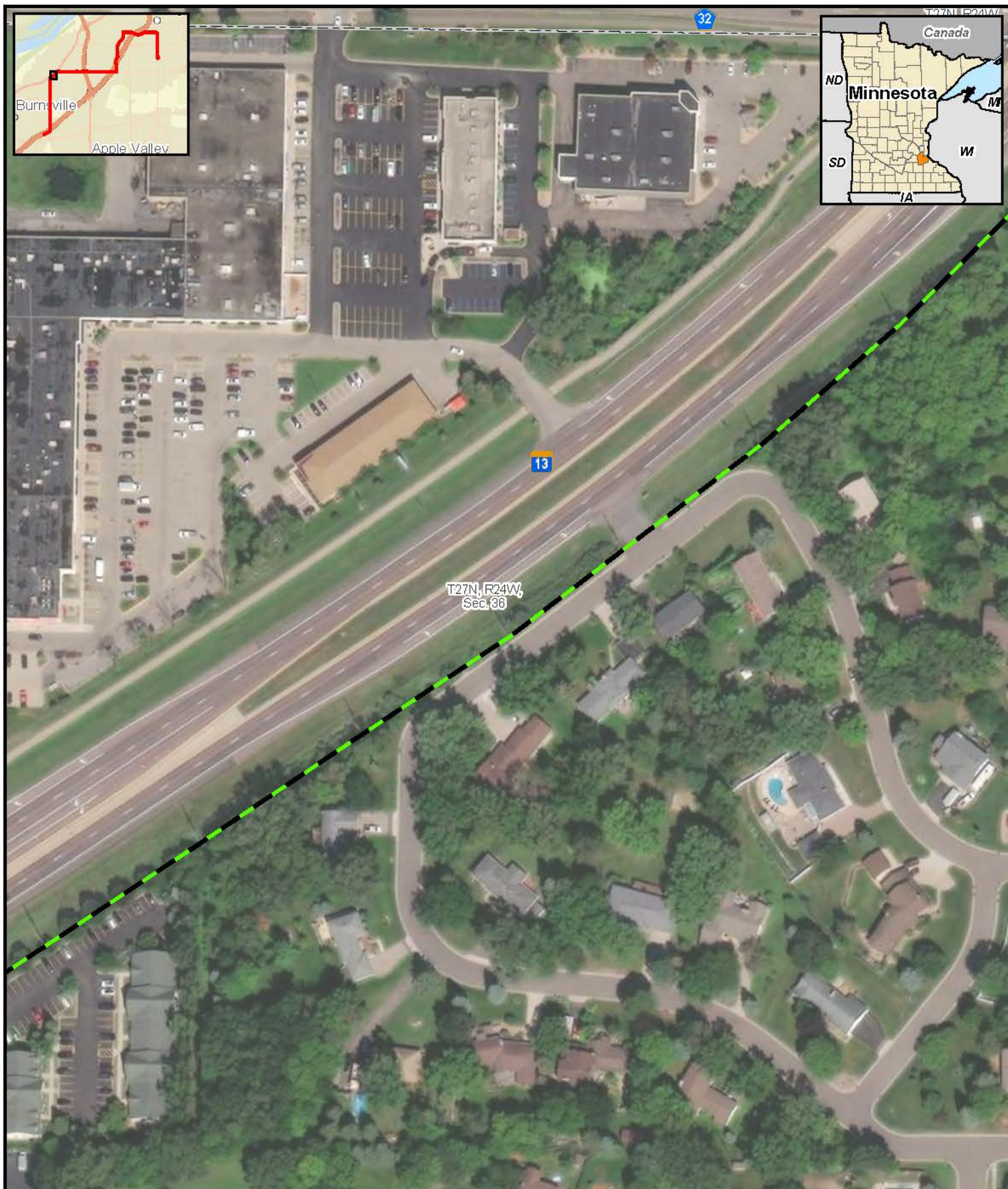
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 26 of 36**

**Proposed 115-kV Alignment**

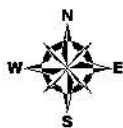
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- Substation
- Section Boundary





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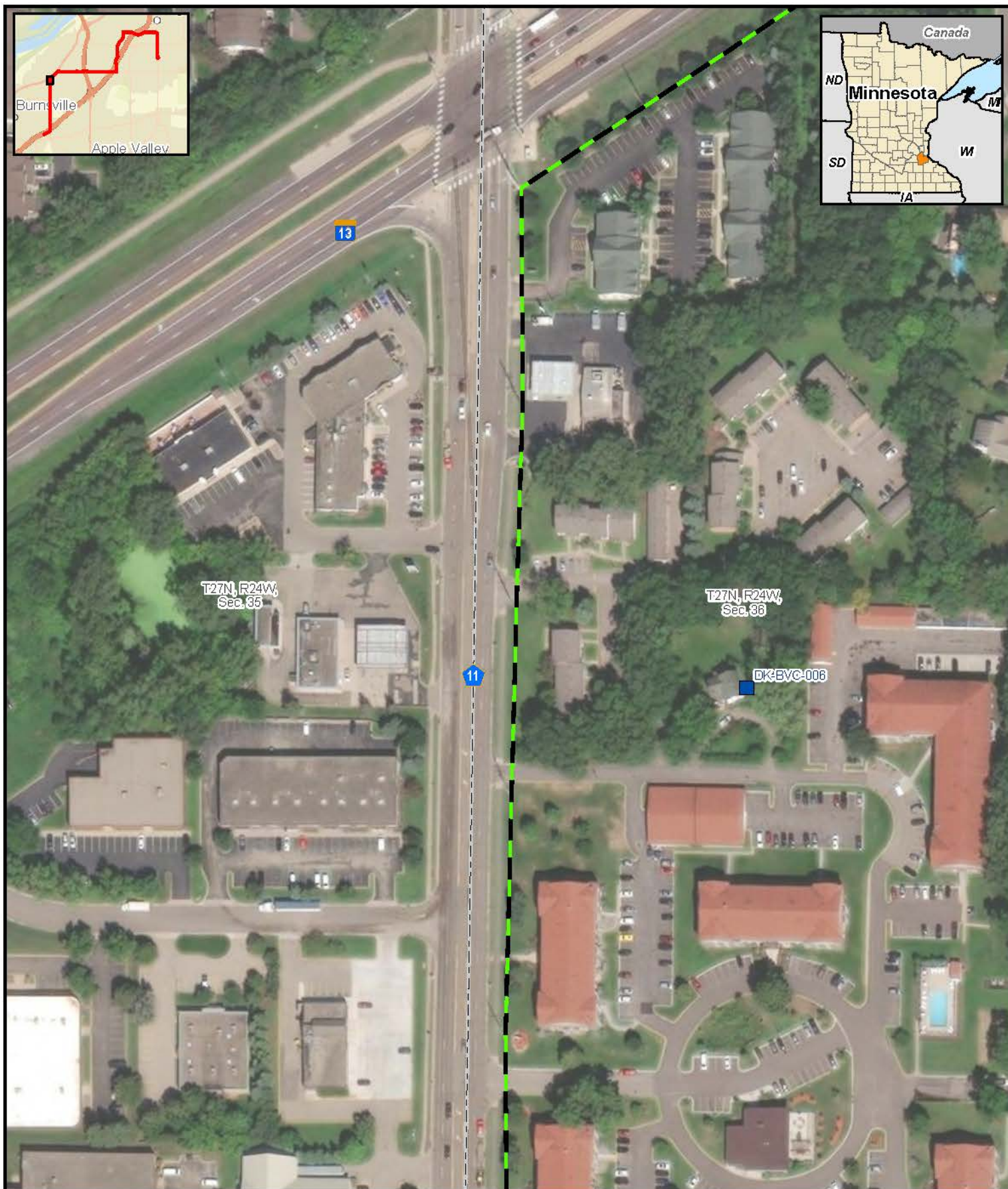
**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 27 of 36**

**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

- Substation
- Section Boundary





**merjent**

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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 28 of 36**

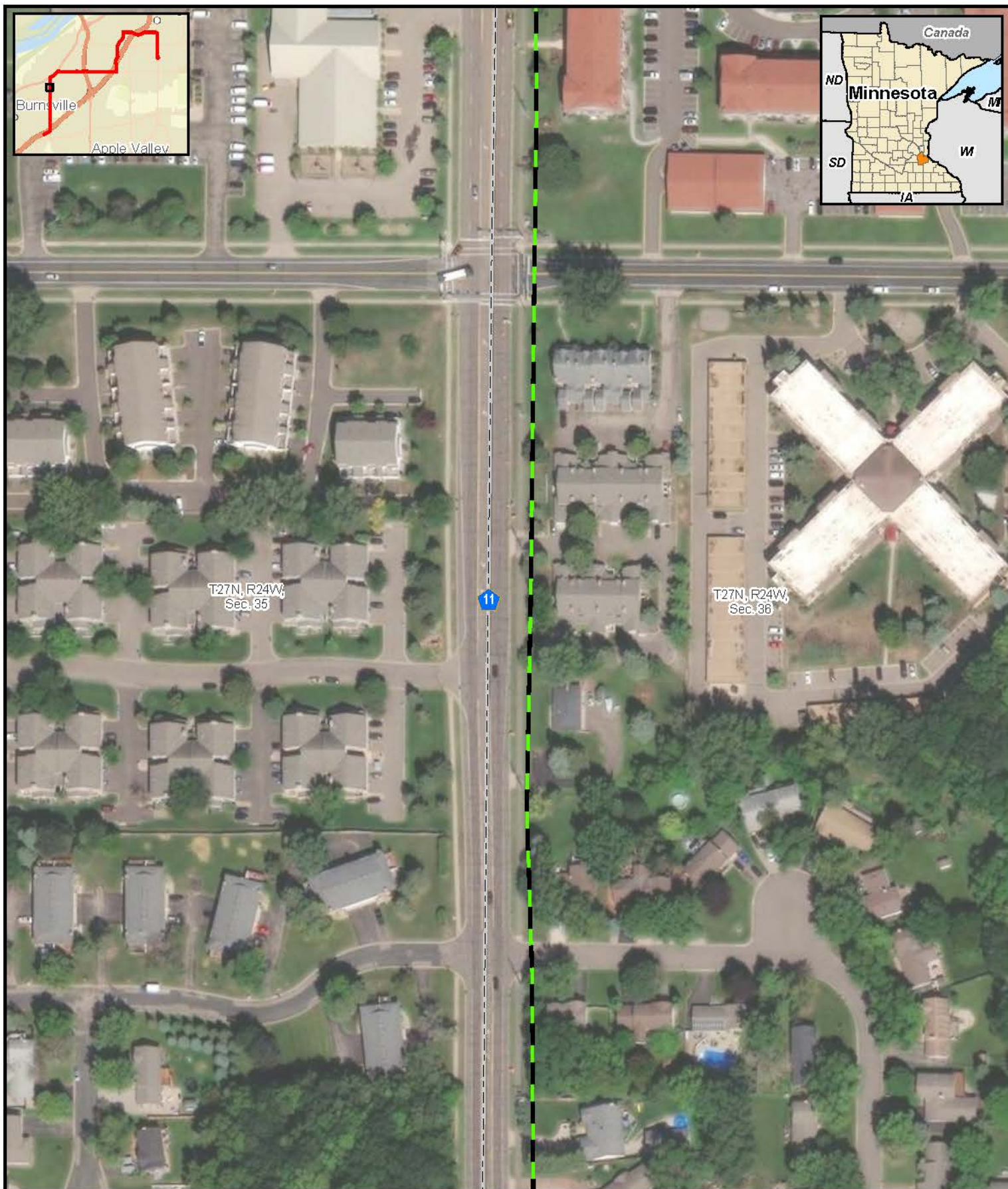
**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

**Legend**

- Substation
- Historic Site
- Section Boundary





**merjent**

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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 29 of 36**

**Proposed 115-kV Alignment**

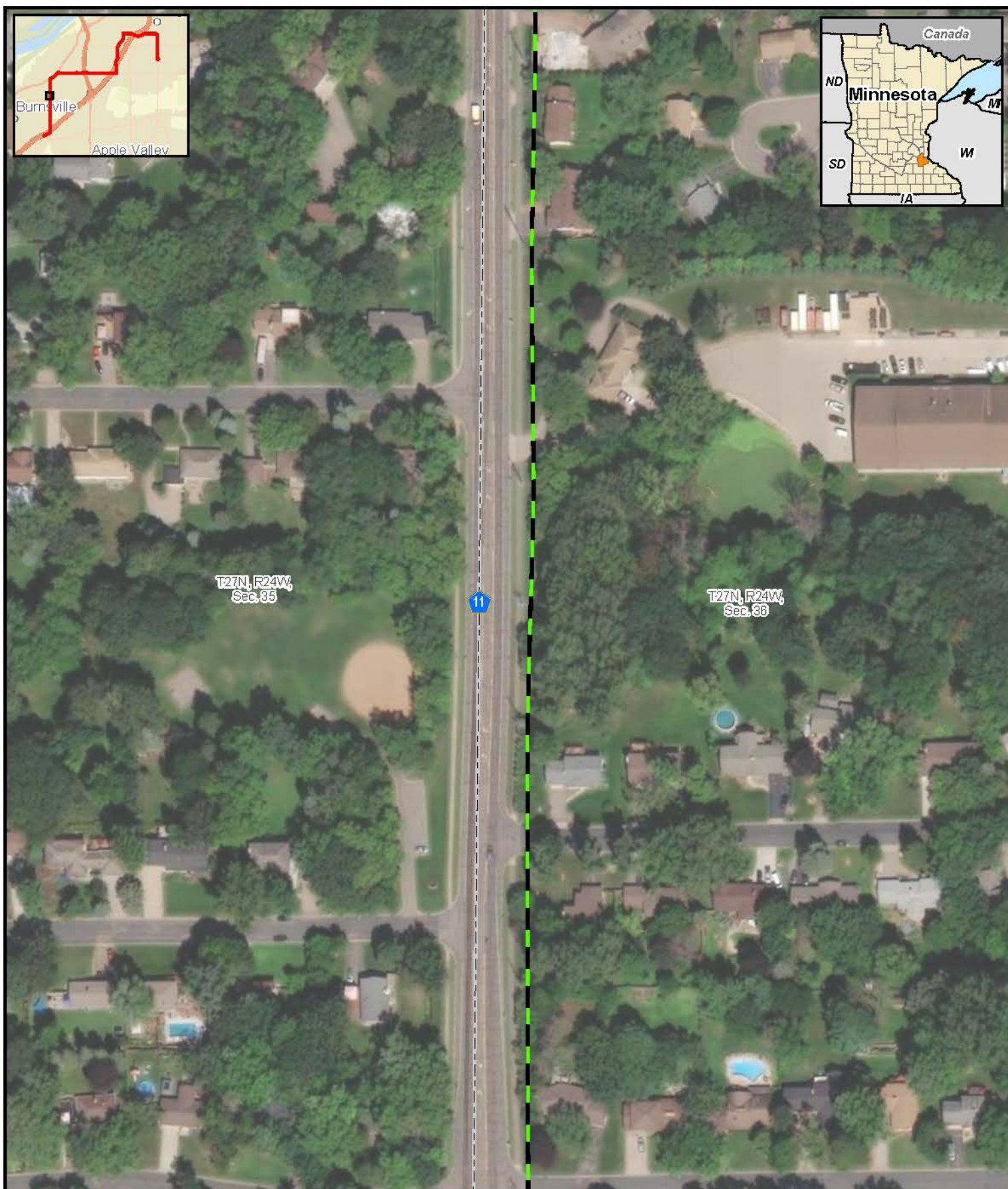
- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
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**Legend:**

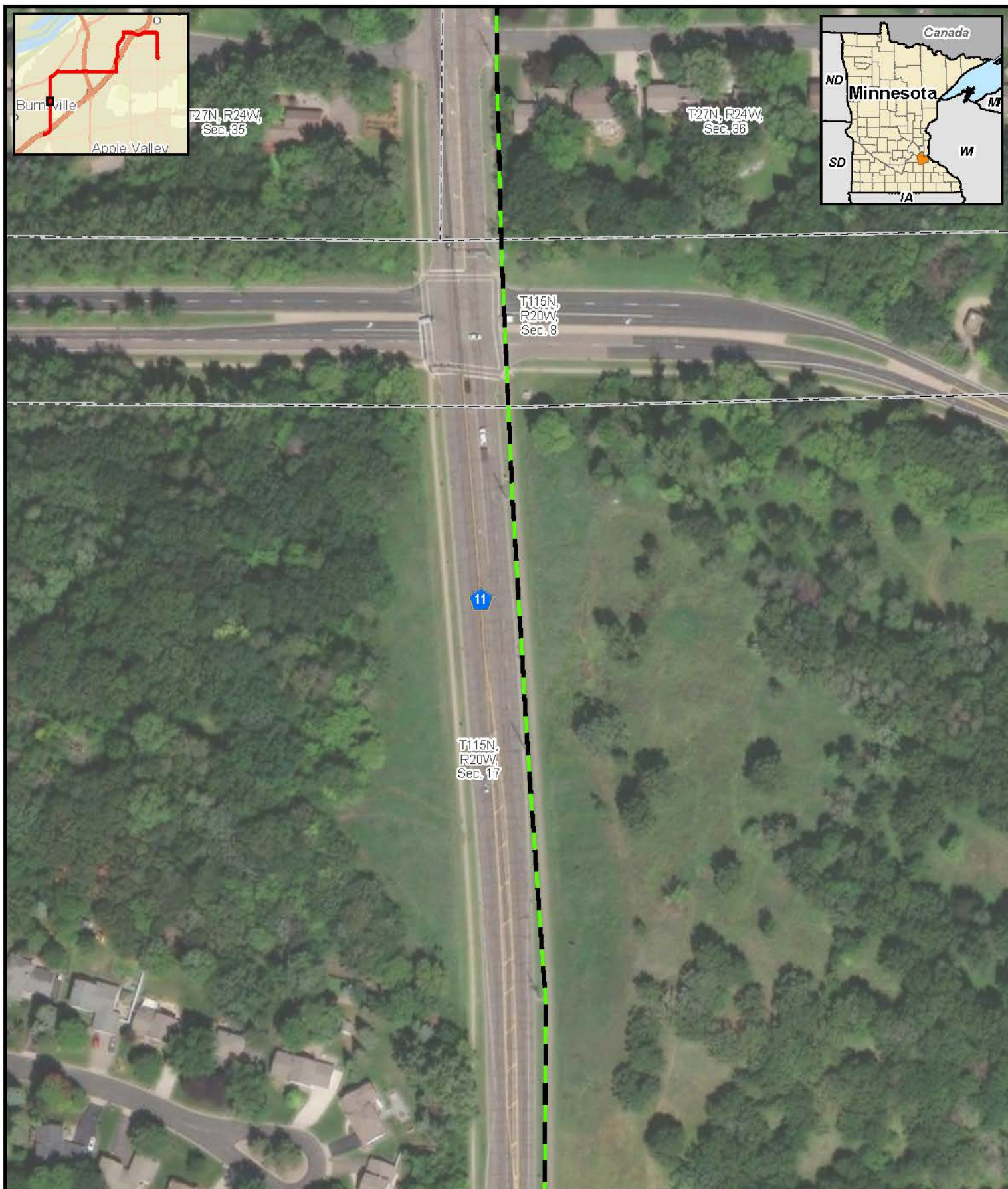
- Substation
- Section Boundary


08/11/2020 Source:



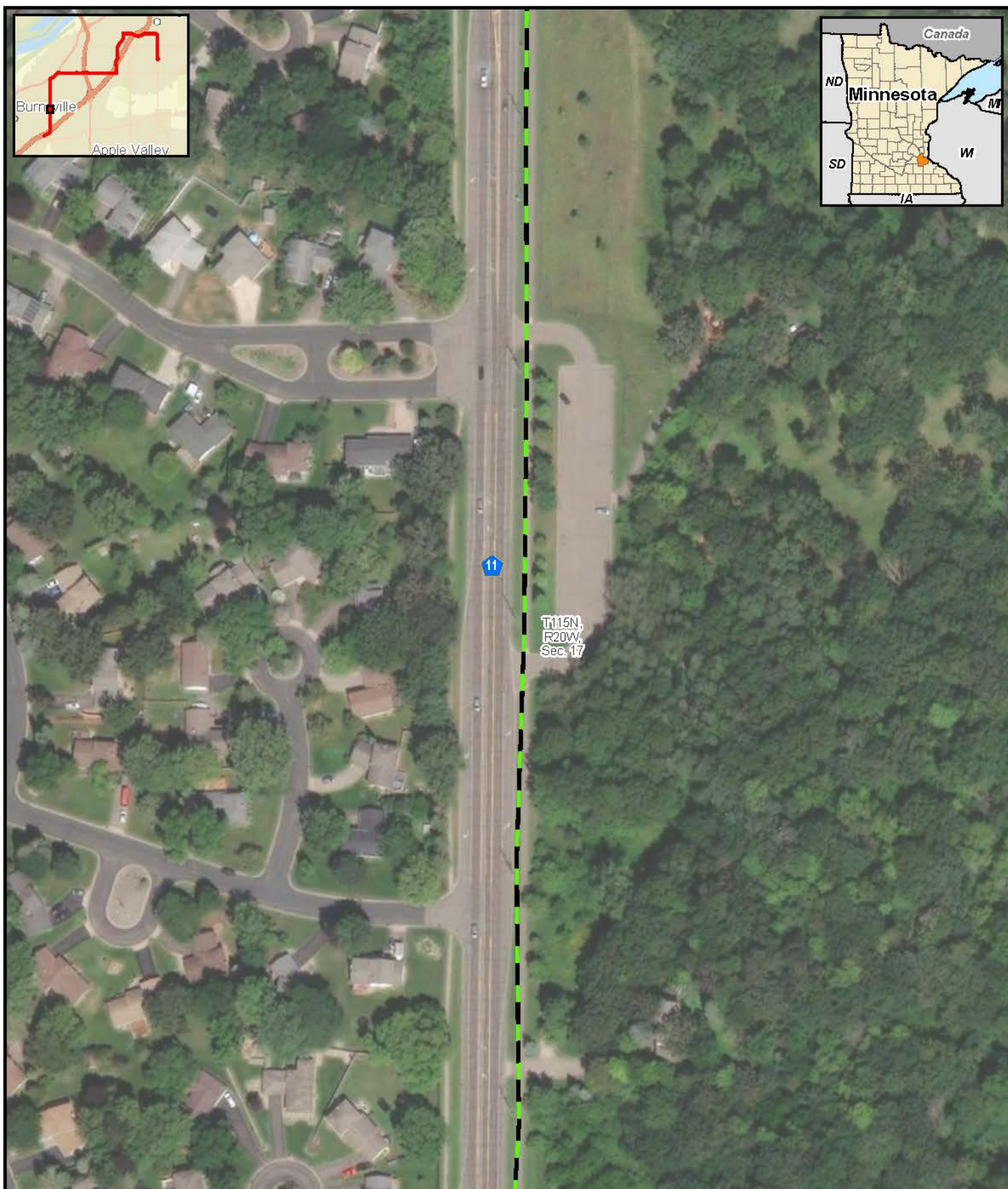




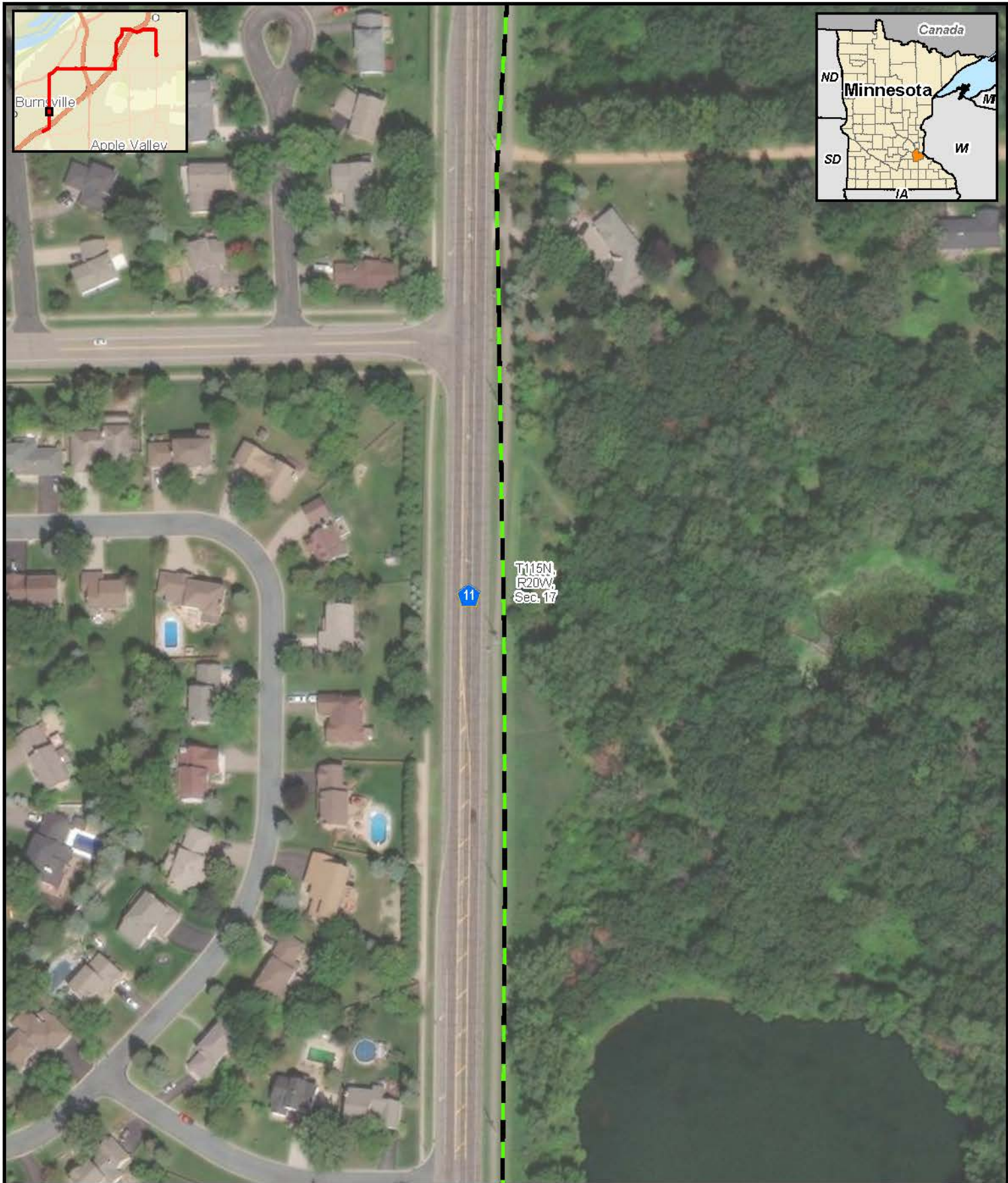


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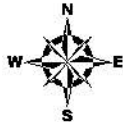








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**Figure 2**  
**Pilot Knob Project**  
**Aerial Map**  
**Dakota County, Minnesota**  
**Page 33 of 36**


**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

- Substation
- Section Boundary








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## Figure 2

### Pilot Knob Project



#### Aerial Map

#### Dakota County, Minnesota

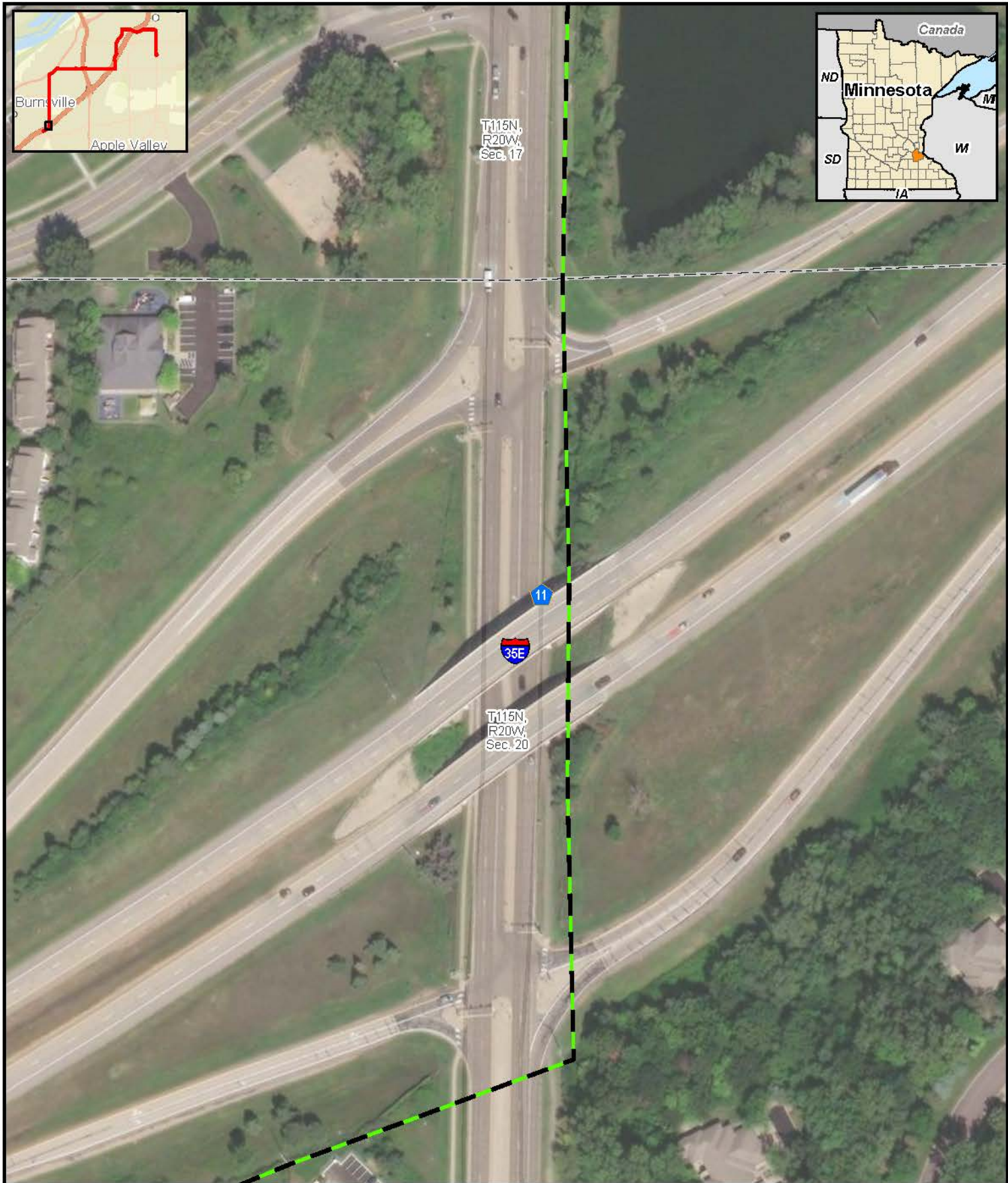
Page 34 of 36


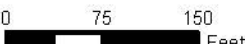
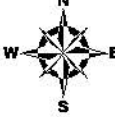


**Proposed 115-kV Alignment**

- Pilot Knob to Deerwood;
- Deerwood to River Hills
- River Hills to Burnsville;
- Great River Energy Existing 69-kV Transmission Line

 Substation  
 Section Boundary





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## Kristin Lenz

---

**From:** Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>  
**Sent:** Tuesday, August 8, 2023 11:07 AM  
**To:** Kristin Lenz  
**Cc:** Strohfus, Mark GRE-MG; Britta Bergland; Lacy Lepisto; GraggJohnson, Kelly (ADM)  
**Subject:** EXTERNAL: RE: Great River Energy Pilot Knob-Burnsville Transmission Line Rebuild Project

**CAUTION:** This email originated from outside of Merjent.

Kristin,

Thank you for submitting this project for review.

Please note for any future submissions, to ensure timely acknowledgment of receipt and logging in on our end, please send to our dedicated email address at [ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us) per [our current guidelines](#).

I have moved your 8/8 email to this dedicated inbox, so you do not need to resubmit at this time.

I've copied Kelly Gragg Johnson on this reply as she will be the primary SHPO review manager for this project under state statute. FYI, We will not review pursuant to Section 106/36 CFR Part 800 until we've been notified by the relevant federal agency, if applicable.

Please reach out if you have any questions.

Sarah

**Sarah Beimers (she/her) | Environmental Review Program Manager**

State Historic Preservation Office

Minnesota Department of Administration

---

**From:** Kristin Lenz <kristin.lenz@merjent.com>  
**Sent:** Tuesday, August 8, 2023 10:40 AM  
**To:** Beimers, Sarah (ADM) <sarah.beimers@state.mn.us>  
**Cc:** Strohfus, Mark GRE-MG <MStrohfu@GREnergy.com>; Britta Bergland <britta.bergland@merjent.com>; Lacy Lepisto <lacy.lepisto@merjent.com>  
**Subject:** Great River Energy Pilot Knob-Burnsville Transmission Line Rebuild Project

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---

Good morning,

Great River Energy proposes to rebuild portions of its existing electrical transmission system within the cities of Eagan and Burnsville, Dakota County, MN between the Pilot Knob and Burnsville Substations, depicted in the figures in the attached letter. The Project would involve removal of existing poles and installing new poles generally following the existing centerline. Presently, the transmission system provides 69-kilovolt (kV) service; following the Project, the rebuilt line will be capable of providing 115-kV service to support growth and expansion in the Project area. A 115-kV transmission line requires wider clearances from trees for safety and reliability, and additional right-of way may be needed for the Project. The Project would also involve upgrades at the Burnsville Substation.

On behalf of Great River Energy, Merjent Inc. (Merjent) conducted a Phase IA Cultural Resources Assessment, which is attached for your review. Great River Energy would appreciate any comments that you may have on the Project and the



proposed route. The enclosed letter provides additional information on the Project, including a map of the Project area and proposed route. Great River Energy also maintains a web site that contains Project information at: [https://greatriverenergy.com/transmission\\_project/pilot-knob-burnsville-transmission-line-rebuild-project/](https://greatriverenergy.com/transmission_project/pilot-knob-burnsville-transmission-line-rebuild-project/). Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Thank you,

Kristin Lenz on behalf of Mark Strohfus, Great River Energy Project Manager

**Kristin Lenz**

*Senior Project Manager*

612.924.3962 direct

763.913.4740 mobile

[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



1 Main Street SE, Suite 300

Minneapolis, MN 55414

612.746.3660

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September 25, 2023

Lacy Lepisto  
Cultural Resource Specialist  
Merjent  
1 Main St SE, Suite 300  
Minneapolis, MN 55414

RE: Great River Energy – Pilot Knob to Burnsville Project  
Rebuild portions of an existing electrical transmission system  
Rebuild 3 sections of transmission line and upgrade the Burnsville Substation  
SHPO Number: 2023-2640

Dear Lacy Lepisto:

Thank you for consulting with our office on the above-referenced project. At this time, our comments are to be considered as technical assistance only as the regulatory framework for this project is unclear.

According to your August 8, 2023 cover letter, Great River Energy is proposing to rebuild three (3) sections of existing transmission line and upgrade the Burnsville Substation. The project will replace existing structures with new poles 60-90 ft above ground and placed 350-400 feet apart, with minor reroutes of the existing line at I-35E and at the Burnsville Substation.

Based on information that is available to us at this time, we have determined that there are **no properties** listed in the National or State Registers of Historic Places and no known or suspected archaeological properties in the area that will be affected by this project.

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 Kelly Gragg-Johnson, Environmental Review Program Specialist, at (651) 201-3285 or [kelly.graggjohnson@state.mn.us](mailto:kelly.graggjohnson@state.mn.us).

Sincerely,



Sarah J. Beimers  
Environmental Review Program Manager



**From:** [Kristin Lenz](#)  
**To:** [Leonard Wabasha \(TO\)](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction  
**Date:** Tuesday, October 24, 2023 11:41:00 AM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[MN SHPO Response 2023-2640.pdf](#)  
[Pilot Knob UDP\\_Rev0\\_20231020.pdf](#)

---

Good afternoon Leonard,

We received the attached response from the MN SHPO regarding the literature review for the Pilot Knob to Burnsville 115-kV Rebuild and Upgrade Project. We have also developed an Unanticipated Discoveries Plan per your guidance, attached for your review.

We hope to file the MPUC Route Permit application in early November.

Please reach out should you have any further questions or comments.

Thank you,  
Kristin

**Kristin Lenz**  
*Senior Project Manager*  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



1 Main Street SE, Suite 300  
Minneapolis, MN 55414  
612.746.3660  
[www.merjent.com](http://www.merjent.com)

---

**From:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Sent:** Friday, August 25, 2023 12:27 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: RE: Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction

**CAUTION:** This email originated from outside of Merjent.

Good Afternoon All

Thank you for the early notification and opportunity to consult with you on this project. Please include at least all the Minnesota Dakota THPO's and include the Minnesota Indian Affairs Council. If you haven't already done so, please complete a desk top study to check for recorded archaeological sites through the Office of the State Archaeologist web portal and or SHPO. Should any sites be



directly in the path of the project please choose an alternate route by consulting with Tribes. In the event of ground disturbing activities please monitor the work in areas determined to be sensitive to the Tribes and have an Unanticipated Discovery Plan in place for the entire proposed project. Thank you for the opportunity to consult, I look forward to future conversation regarding this project. Have a Great Day!

Respectfully,



**LEONARD WABASHA**

Director of Cultural Resources • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://shakopeedakota.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

---

**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Sent:** Friday, August 25, 2023 12:10 PM

**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>

**Cc:** Strohfus, Mark GRE-MG <[MStrohf@GREnergy.com](mailto:MStrohf@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction

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Good morning,

Great River Energy is proposing to rebuild and upgrade approximately 8.75 miles of its existing electrical transmission system within the cities of Eagan and Burnsville in Dakota County, Minnesota (Project). The enclosed letter provides additional information on the Project, including a map of the Project area and proposed route. Great River Energy would appreciate any comments that you may have on the Project and the proposed route.

The Project will include rebuilding and upgrading three sections of transmission line: the line between the Pilot Knob and Deerwood Substations; the line between the Deerwood and River Hills Substations; and the line between the River Hills and Burnsville Substations. Great River Energy is proposing to construct the new 115-kV transmission line generally following the centerline of the existing 69-kV transmission line. The Project would involve removal of existing poles within the Great River Energy right-of-way, and replacement with new, 60- to 95-foot-high poles placed 350 to 400 feet apart, also within the Great River Energy right-of-way. Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in Fall 2023.



Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,  
Kristin Lenz on behalf of Mark Strohfus, Great River Energy

**Kristin Lenz**  
**Senior Project Manager**  
612.924.3962 direct  
763.913.4740 mobile  
[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** [Kristin Lenz](#)  
**To:** [Leonard Wabasha \(TO\)](#)  
**Cc:** [Strohfus, Mark GRE-MG](#); [Mandy Bohnenblust](#)  
**Subject:** RE: Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction  
**Date:** Tuesday, August 29, 2023 1:28:00 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[GRE Pilot Knob Phase IA LetterReport 20230808.pdf](#)

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Good afternoon Leonard,

Thank you for your response. We have separately provided the Project Introduction letters to MIAC, OSA and to the 11 THPOs located in Minnesota. I have also attached the Phase IA letter report that Merjent has conducted on behalf of Great River Energy and submitted to the MN SHPO for review; we have not received a response from the MN SHPO yet.

When I emailed the Mille Lacs Band of Ojibwe THPO, Terry Kemper, we received an undeliverable message. Do you by chance know if there may be a new person in that position?

Thank you!  
Kristin

**Kristin Lenz**  
Senior Project Manager  
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[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)



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**From:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>  
**Sent:** Friday, August 25, 2023 12:27 PM  
**To:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>  
**Cc:** Strohfus, Mark GRE-MG <[MStrohfu@GREnergy.com](mailto:MStrohfu@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>  
**Subject:** EXTERNAL: RE: Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction

**CAUTION:** This email originated from outside of Merjent.

Good Afternoon All

Thank you for the early notification and opportunity to consult with you on this project. Please include at least all the Minnesota Dakota THPO's and include the Minnesota Indian Affairs Council. If you haven't already done so, please complete a desk top study to check for recorded archaeological sites through the Office of the State Archaeologist web portal and or SHPO. Should any sites be directly in the path of the project please choose an alternate route by consulting with Tribes. In the



event of ground disturbing activities please monitor the work in areas determined to be sensitive to the Tribes and have an Unanticipated Discovery Plan in place for the entire proposed project. Thank you for the opportunity to consult, I look forward to future conversation regarding this project. Have a Great Day!

Respectfully,



**LEONARD WABASHA**

Director of Cultural Resources • Cultural Resources  
Shakopee Mdewakanton Sioux Community  
d: 952.496.6120  
[shakopeedakota.org](http://shakopeedakota.org)  
[Leonard.Wabasha@shakopeedakota.org](mailto:Leonard.Wabasha@shakopeedakota.org)

The Shakopee Mdewakanton Sioux Community is a federally recognized, sovereign Indian tribe located southwest of Minneapolis/St. Paul. With a focus on being a good neighbor, good steward of the earth, and good employer, the SMSC is committed to charitable donations, community partnerships, a healthy environment, and a strong economy.

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**From:** Kristin Lenz <[kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com)>

**Sent:** Friday, August 25, 2023 12:10 PM

**To:** Leonard Wabasha (TO) <[leonard.wabasha@shakopeedakota.org](mailto:leonard.wabasha@shakopeedakota.org)>

**Cc:** Strohfus, Mark GRE-MG <[MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com)>; Mandy Bohnenblust <[mandy.bohnenblust@merjent.com](mailto:mandy.bohnenblust@merjent.com)>

**Subject:** Great River Energy Pilot Knob Rebuild and Upgrade Project, Dakota County, MN - Project Introduction

You don't often get email from [kristin.lenz@merjent.com](mailto:kristin.lenz@merjent.com). [Learn why this is important](#)

This message came from **outside the organization**. Do Not click on links, open attachments or respond unless you know the content is safe.

Good morning,

Great River Energy is proposing to rebuild and upgrade approximately 8.75 miles of its existing electrical transmission system within the cities of Eagan and Burnsville in Dakota County, Minnesota (Project). The enclosed letter provides additional information on the Project, including a map of the Project area and proposed route. Great River Energy would appreciate any comments that you may have on the Project and the proposed route.

The Project will include rebuilding and upgrading three sections of transmission line: the line between the Pilot Knob and Deerwood Substations; the line between the Deerwood and River Hills Substations; and the line between the River Hills and Burnsville Substations. Great River Energy is proposing to construct the new 115-kV transmission line generally following the centerline of the existing 69-kV transmission line. The Project would involve removal of existing poles within the Great River Energy right-of-way, and replacement with new, 60- to 95-foot-high poles placed 350 to 400 feet apart, also within the Great River Energy right-of-way. Great River Energy is planning to submit a Route Permit Application to the Minnesota Public Utilities Commission in Fall 2023.



Please contact Mark Strohfus at 763-445-5210 or [MStrohfus@GREnergy.com](mailto:MStrohfus@GREnergy.com) should you need additional information.

Regards,

Kristin Lenz on behalf of Mark Strohfus, Great River Energy

**Kristin Lenz**

*Senior Project Manager*

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