



September 11, 2013

Mr. Dylan Eigenberger
HDR Engineering, Inc.
701 Xenia avenue South
Minneapolis, MN 55416-3636

RECEIVED

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**SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION**

SDCL 1-19A-11.1 PROJECT CONSULTATION

Project: 130408008S – Brookings County Substation to SD/MN Border Segment of the CapX2020 Brookings County to Hampton 345 kV Transmission Line Project
Location: Brookings County
(PUC)

Dear Mr. Eigenberger,

Thank you for the opportunity to comment on the above referenced project pursuant to South Dakota Codified Law 1-19A-11.1. The South Dakota Office of the State Historic Preservation Officer (SHPO) would like to provide the following comments regarding the effects of the proposed project on the non-renewable cultural resources of South Dakota.

On August 29, 2013, we received your letter and the report entitled “Level III Archaeological Survey for the Brookings County Substation to SD/MN Border Segment of the CapX2020 Brookings County to Hampton 345 kV Transmission Line Project” prepared by Dylan Eigenberger. You indicate in your report that two archaeology sites, 39BK257 and 39BK160, were recorded during the archaeology survey.

According to the report, newly recorded site 39BK257 was not evaluated for listing on the National Register of Historic Places (National Register), but will be avoided during construction activities. We agree with the avoidance recommendations for site 39BK257, and the establishment of a “no construction” buffer zone around the site. We recommend using a 30 meter buffer zone clearly delineated on the ground for avoidance by heavy equipment. It is unclear if site 39BK257 is located within the permanent right-of-way. If so, we suggest provisions be made so the site is avoided during any future ground disturbing activities.

Also according to the report, previously recorded site 39BK160 was revisited and determined to be not eligible for listing on the National Register. However, we cannot concur with the determination of not eligible for site 39BK160. The report does not provide information consistent with the Secretary of Interior’s “Standards and Guidelines for Evaluation”.

Since we do not concur with the determination of eligibility for site 39BK180, we recommend minimizing, as much as possible, ground disturbance within the boundaries of the site. We further recommend that a qualified archaeologist monitor ground disturbing activities in this area.

We appreciate that our office is included in the processes established for unanticipated discoveries and unanticipated discoveries of human remains. Under normal circumstances we will respond within the two day time period, but circumstances may arise when we are unable to respond within the established time period. Our non-response should not be considered our concurrence.

We recommend including the following contact information with your unanticipated discovery plans.

Jim Haug
State Archaeologist
Archaeological Research Center
PO Box 1257
Rapid City, SD 57709-1257
Phone: 605-394-1936

Paige Olson
Review and Compliance Coordinator
South Dakota State Historical Society
900 Governors Drive
Pierre, SD 57501
Phone: 605-773-6004

In conclusion, upon review of the report entitled "Level III Archaeological Survey for the Brookings County Substation to SD/MN Border Segment of the CapX2020 Brookings County to Hampton 345 kV Transmission Line Project" and pursuant to SDCL 1-19-11.1, it is evident that the project will not damage, destroy or encroach upon historic properties listed on the National or State Register of Historic Places. We agree with your avoidance recommendations for unevaluated site 39BK257. We further advise minimizing ground disturbance at site 39BK180, and have a qualified archaeologist monitor ground disturbing activities as not enough information was provided for us to concur with the determination of not eligible.

Should you require any additional information, please contact Paige Olson at (605) 773-6004. Your concern for the non-renewable cultural heritage of South Dakota is appreciated.

Sincerely,

Jay D. Vogt
State Historic Preservation Officer


Paige Olson
Review & Compliance Coordinator

Cc: Karen Cremer, South Dakota Public Utilities Commission