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12 September 2008

Mr. Kurt Donelan East River Electric Power Coop, Inc. PO Box 227 121 SE 1st St. Madison, SD 57042

Re: Letter Report – Addition to archaeological survey conducted prior to construction of the proposed Chancellor 115kv Transmission Line project in Lincoln County, South Dakota.

Dear Mr. Donelan,

In April of this year (2008) you requested, on behalf of your electrical power cooperative, a cultural resource inventory at the proposed installation of the Chancellor 115kv Transmission Line in Lincoln and Turner Counties in South Dakota. Workers from the preservation firm Cultural Heritage Consultants (CHC) conducted the survey in November 2007. The survey area(s) were within the S ½, S ½, sections 23 and 24, T99N-R52W. Additionally, the W ½, W ½, of sections 18 and 19, the S ½, S ½, sections 7 and 8, N ½, N ½, sections 15 and 16 and W ½, W ½, SW and NW portion of section 11. All are in T99N-R51W (see Figure 1).

The project scope-of-work (SOW) consisted of conducting a Class III archaeological investigation of said locales as a precursor to the proposed installment of overhead power poles. In addition to several telephone conversations, you sent to me, via electronic mail (email), a message stating the project details, you noted the following:

This will be an overhead transmission line with single wood poles...Due to the higher voltage of the line, the cost, and maintenance issues, none of our transmission line is [will be] placed underground. Highway Diggers and Bucket Trucks are used to install the line. A Highway Digger drill a 30" hole into the ground 8' [Ft] to 12' [Ft] deep. The poles are placed in the holes. Bucket Trucks are used to string the conductor on the poles.

Pole placement in wetlands is avoided if possible. We usually try to span over low areas. Span lengths are 240' to 300'. If poles are place[d] in wet area[s], pea rock is used to secure the pole in the ground. Easements on private property have been obtained on half the project. In these areas, poles will be place[d] 2' on private property from the property line....In areas where easements were not obtained, the poles will be place[d] in the public ROW, usually the 31' line on a 33' ROW. (Pers. Comm. Kurt Donelan to Todd Kapler 11/6/07.)

Given the project corridor(s) you provided, the total survey area was 145,860 square feet while the *actual* area(s) surveyed tallied 25,518 square feet or 7,850 square meters or .60 acres along 4.83 miles (lineal) miles of ROW corridor(s). With a right-of-way (ROW) width of about 2 Ft (.60m), the corridor length far surpasses the width and therefore, the actual surveyed area is quite small (.60 acres).

Researchers conducted a visual examination (i.e., surface reconnaissance) of the entire project area and its margins for any evidence of cultural material or associated cultural debris. No cultural materials of any kind were observed or recorded. Workers conducted both surface reconnaissance and a series of auger tests placed at appropriate intervals excavated to a depth of 75 centimeters below surface (cmbs). Surveyors screened all the displaced soil thru ¼" wire mesh.

At my request, Ms. Jane Watts of the South Dakota State Archaeological Research Center (SARC) conducted background research of previous sites and surveys within the project area and the surrounding area as per state protocol. Ms. Watts reported a single site within the project area. This site (39LN2013) is rail lines associated with the Great Northern Railroad. The rail line scarcely traverses the project area and, further, the long linear rail line extends well beyond the project boundaries. Surveys within a 1-mile radius included ALN-0019, ALN-0037, ATU-0031, ESD-312, ALN-0122, ESD-0101, ESD-032, ALN-0077, ALN-0099, ALN-0101, ALN-0107, ESD-0326 AND ALN-0148.

The survey area is located within the Vermillion Basin and the extreme western margin of the Lower Big Sioux Study Region. In November 2007, I conducted an archaeological survey over the proposed project area. Prior to conducting the survey, I contacted the appropriate East River Electric Power Coop (ERE) officials who notified landowners of the approaching archaeological survey. With this solid background information, the field portion of this survey was relatively benign with CHC workers finding no surface or subsurface cultural debris.

Because I found no cultural materials within the project boundaries other than modern debris, the letter report recommended that a determination of No Historic Properties in the Area of Potential Effects be made regarding the construction activities and the project be granted Section 106 clearance to proceed.

. . .

Later this summer (2008), you again contacted our firm regarding additional work along the same configuration as the original survey area. That is, you and your power coop (East River

Electrical Coop) decided to extend the electrical overhead lines another half-mile (2,640 lineal feet or 812m) in the NW ¼, section 19, T99N-R51W. This locale is immediately adjacent to the previous survey corridor. Additionally, your organization has requested two additional small (60 Ft x 60 Ft) anchor points be archaeological tested. The first area (labeled #2 on included topo map) is in the NW ¼, NE ¼, section 17, T99N-R51W, and the second anchor locale (labeled #3 on included topo map) is within the NW ¼, NW ¼, section 14, T99N-R51W. All three "new" areas and previous survey area are clearly illustrated in Figure 1 of this report.

As part of these *additional* survey areas, CHC contacted Ms. Jane Watts of the SD Archaeological Research Center about an additional record search for areas literally within a few feet of an earlier records search less than 10 months old. Ms. Watts noted that since the new area to be investigated is within a few feet of an earlier records search (see earlier above), no new search was required as no additional information has come in since the original records search (Pers. Comm: Todd Kapler to Jane Watts 9-2008.)

Researchers did not record or recover any additional cultural debris or geosols with the proposed new line installation or the proposed new anchor stations. A reconnaissance survey and several subsurface auger tests did not record any additional debris. Therefore, this report recommends clearance to proceed with the proposed project.

However, as no survey can possibly define all cultural resources within a region, should cultural materials be detected during any phase of this improvement project, state and possibly federal preservation officials must be contacted immediately so that the extent and significance of the discovery can be ascertained before construction work is continued. If human remains are found during any phase of this project, all work activities must be stopped and the Office of the State Archaeologist contacted immediately.

Finally, work described here, and the assessments provided, are subject to review by state and possibly federal cultural review and compliance personnel. Consequently, this letter report is advisory in nature and does not constitute authorization to proceed with the proposed undertaking. Should you have any additional questions, please do not hesitate to contact our office at your convenience.

Sincerely,

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Todd Kapler, RPA Principal Investigator Cultural Heritage Consultants



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