

SHPO Letter, dated September 11, 2024



September 11, 2024

Kevin Gilmore
HDR, Inc.
369 Inverness Parkway, Suite 325
Englewood, CO 80112

SDCL 1-19A-11.1 Consultation

Project: 240109007S – Otter Tail Power Company - Big Stone South to Alexandria (BSSA) Transmission Line Project
Location: Grant
PUC - South Dakota Public Utilities Commission

Dear Mr. Gilmore,

Thank you for the opportunity to comment on the above referenced project pursuant to South Dakota Codified Law (SDCL) 1-19A-11.1. SDCL 1-19A-11.1 outlines a specific process that must be followed prior to any governmental action that may harm any historic property that is included in the National or State Registers of Historic Places. The South Dakota Office of the State Historic Preservation Officer (SHPO) would like to provide the following comments concerning effect of the proposed project on the non-renewable cultural resources of South Dakota.

On August 20, 2024, the SHPO received your letter, the report titled, "Supplemental Level I Cultural Resource Letter Report (Confidential) for Big Stone South to Alexandria 345 kV Transmission Line Project" by Andrew Mueller of HDR, Inc., and shapefiles. Previously, in a letter dated April 2, 2024, SHPO provided comments on the report titled "A Level III Cultural Resource Survey for the Big Stone South to Alexandria 345-kV Transmission Line Project" by Lars Boyd of HDR and requested to review the results of any additional efforts to identify cultural resources. Then in a letter dated June 12, 2024, SHPO provided comments on the report titled, "A Level III Cultural Resource Survey Addendum for the Big Stone South to Alexandria 345-kV Transmission Line Project" and the avoidance measures and monitoring plans for FLA-01. According to your August 20, 2024, letter and the supplemental letter report, an additional ten acres was added to the project's "flex area" due to the expansion of the substation and a landowner's requested reroute. This additional flex area was subject to a Level I records search and review of historical maps and aerial photographs. It was determined that the additional ten acres of flex area has been subject to multiple Level III cultural resource surveys over the past six years and that the area has largely been previously disturbed with the construction of two electrical substations.

Based upon the information provided in the previous reports and the supplemental report, there are no properties listed in the National or State Registers of Historic Places within the proposed project's additional flex area. Additionally, there are no properties listed in the National or State Registers of Historic Places which will be visually affected by the proposed project. Therefore, SHPO has determined that the proposal will not encroach upon, damage, or destroy a historic property which is included in the National or State Registers of Historic Places, pursuant to SDCL 1-19A-11.1.

As the proposed project seeks a Facility Permit from the South Dakota Public Utilities Commission (PUC), the proposal will also be subject to the requirements outlined in the Administrative Rules of South





Dakota (ARSD) at 20:10:22:23. As noted in our letter dated June 12, 2024, SHPO agrees that avoidance fencing should be placed around FLA-01 and that Tribal Cultural Specialists should monitor construction activities in the vicinity of FLA-01 to ensure that the resource is not damaged during project implementation. Additionally, as previously stated in the April 2, 2024, letter, SHPO agrees that spanning the transmission line across 39GT2007 will not cause ground disturbance within the site boundary and will not adversely affect the eligibility of the site to the National Register of Historic Places.

Should you require any additional information, please contact Katie Wasley at Katie.Wasley@state.sd.us or at 605-773-2906.

Sincerely,
Benjamin F. Jones, PhD
Interim State Historic Preservation Officer

A handwritten signature in cursive script that reads "Katie Wasley".

Katie Wasley
Historic Preservation Specialist

CC: Megan Mueller - HDR, Inc.
Jennifer Hanley - HDR, Inc.
Jason Weiers - Otter Tail Power Company
Jon Thurber - PUC
Darren Kearney - PUC
Garrie Kills a Hundred - Flandreau Santee Sioux Tribe Tribal Historic Preservation Officer
Dianne Desrosiers - Sisseton Wahpeton Oyate Tribal Historic Preservation Officer