Appendix H
Cultural Resources Report

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Cultural Resources Literature Review and Phase I Archaeological Survey for the North Rochester to Skyway High Voltage Transmission Line Project

Pine Island, Goodhue County, Minnesota

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MANAGEMENT SUMMARY

The purpose of this report is to summarize the Cultural Resources Literature Review and Phase I Archaeological Survey completed by HDR Engineering, Inc. (HDR) on behalf of Xcel Energy, Inc. (Xcel Energy) concerning the proposed North Rochester to Skyway High Voltage Transmission Line Project (Project). Results of this Phase I Archaeological Survey will be used to inform applicable portions of the Route Permit Application (RPA) being prepared for the Project (described herein), to support the permitting of the Project, and for compliance with state cultural resources laws. Xcel Energy plans to submit the RPA with the Minnesota Public Utilities Commission (PUC) in the first quarter of 2026. The RPA will be filed in accordance with Minnesota Statutes (Minn. Stat.) 216I.07 under the standard review process. The Project will be constructed on approximately 55 acres in Pine Island, Goodhue County, Minnesota.

Xcel Energy is proposing to permit, construct, and operate a new, approximately 1.3-mile-long, double-circuit, 345-kilovolt (kV) high voltage transmission line that will connect Xcel Energy's existing North Rochester Substation to new substation facilities located at a proposed technology center/mixed use industrial development site (development site) near the City of Pine Island in portions of Sections 29 and 30, Township 109N, Range 15E, Goodhue County, Minnesota (**Figure 1**). The development site (known as the Skyway Project) is undergoing permitting and approval processes with the City of Pine Island separate from this 345-kV transmission line Project. HDR did not survey the Skyway Project development site as part of this field effort.

The existing North Rochester Substation proposed expansion area is located on the west side of Highway 52 and the proposed Skyway Project development site is located on the east side of Highway 52. To accommodate the 345-kV high voltage transmission line proposed to connect the North Rochester Substation to the Skyway Project, Xcel Energy's existing North Rochester Substation will be expanded to the north by approximately 17.79 acres and four smaller substation facilities (Skyway substations 1-4) will be constructed within the development site. The North Rochester Substation expansion will involve site preparation, grading and installation of substation equipment, transmission line termination, associated facilities, security fencing, and connection to the existing substation. The North Rochester Substation expansion is necessary to address current and future planned transmission line operational needs as part of the proposed development project. The 345-kV transmission line intended to connect the two substations is proposed to have a 150-foot-wide right-of-way (ROW).

Figure 1 illustrates the Phase I Archaeological Survey area (Project area) completed as a part of this report. For the purposes of this report, the Project area consists of anticipated areas of potential construction disturbance including the substation expansion area and a 150-foot-wide transmission line ROW. The proposed transmission line, North Rochester Substation expansion, and Skway substations 1-4 would be constructed primarily on land currently being farmed for corn and soybeans.

The Project is not anticipated to become a federal undertaking because it does not require a federal permit, license, or approval; is not located on federally owned or managed land; and is not receiving

federal financial assistance. If the Project is determined to be a federal undertaking, the lead federal agency will determine if compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, is needed. Considering the Project will be applying for approval of a Route Permit from the PUC, compliance with state cultural resources laws is required. This survey and documentation was prepared to meet state cultural resources regulations, including the Minnesota Field Archaeology Act (MS 138.31-.42), Minnesota Private Cemeteries Act (MS 307.08, subd 9-10), and Minnesota Historic Sites Act (MS 138.661-138.669).

HDR reviewed records maintained by the Minnesota Office of the State Archaeologist (OSA) available via the online portal and Minnesota State Historic Preservation Office (SHPO) in Minnesota's Statewide Historic Inventory Portal (MnSHIP) to identify previously reported archaeological sites within 1 mile of the Project area (Archaeological Review Area) and previously inventoried architectural history properties within 0.25 mile of the Project area (Architectural History Review Area). There are no previously recorded archaeological sites and two known cemeteries within the Archaeological Review Area. Neither of these previously recorded cemeteries are located within the Project area. There are seven previously inventoried architectural history properties within the Architectural History Review Area and three of these intersect with the Project area. These three architectural history properties are determined by the Minnesota SHPO to be Not Eligible for listing in the National Register of Historic Places (NRHP), State Register of Historic Places, or the Historic Sites Network.

HDR staff member John Seidl acted as Principal Investigator for the Phase I field survey with Laura Koski acting as Field Supervisor. The field survey was completed October 29, 2025, by Laura Koski. The proposed transmission line, substation expansion, and Skyway substations 1-4 would be constructed primarily on land currently being farmed for corn and soybeans. The portion of the field survey within the North Rochester Substation expansion area was pedestrian-surveyed on a 10-meter interval due to the low to moderate visibility. Pedestrian survey within the proposed transmission line ROW was completed at a 15-meter interval due to the high ground surface visibility. The field survey covered 39.47 acres. The existing North Rochester Substation was not surveyed. No cultural materials were identified. HDR recommends the Project, as proposed, does not require any further cultural resources work.

Contents

Tables

Figures

Appendices

1 INTRODUCTION

Xcel Energy is preparing to submit a Route Permit Application (RPA) to the Minnesota Public Utilities Commission (PUC) to construct and operate a double-circuit, 345-kilovolt (kV) transmission line and proposed expansion of the existing North Rochester Substation (Project). The transmission line will connect the North Rochester Substation expansion to substations 1-4 built at the Skyway Project[1] development site (a separate project not surveyed as a part of this field effort). The connecting transmission line is anticipated to be an approximately 1.3-mile long, 345-kV line constructed using double-circuit structures. Xcel Energy contracted HDR to conduct a Phase I Archaeological Survey to support the permitting of the Project with the PUC and compliance with state cultural resources laws. The Project will be constructed on approximately 55 acres in Pine Island, Goodhue County, Minnesota (**Figure 1**). The Project area consists of anticipated areas of potential construction disturbance including the North Rochester Substation expansion area and a 150-foot-wide transmission line Right of Way (ROW) up to its connection with the intended Skway Project mini substations at the southeastern end of the transmission line.

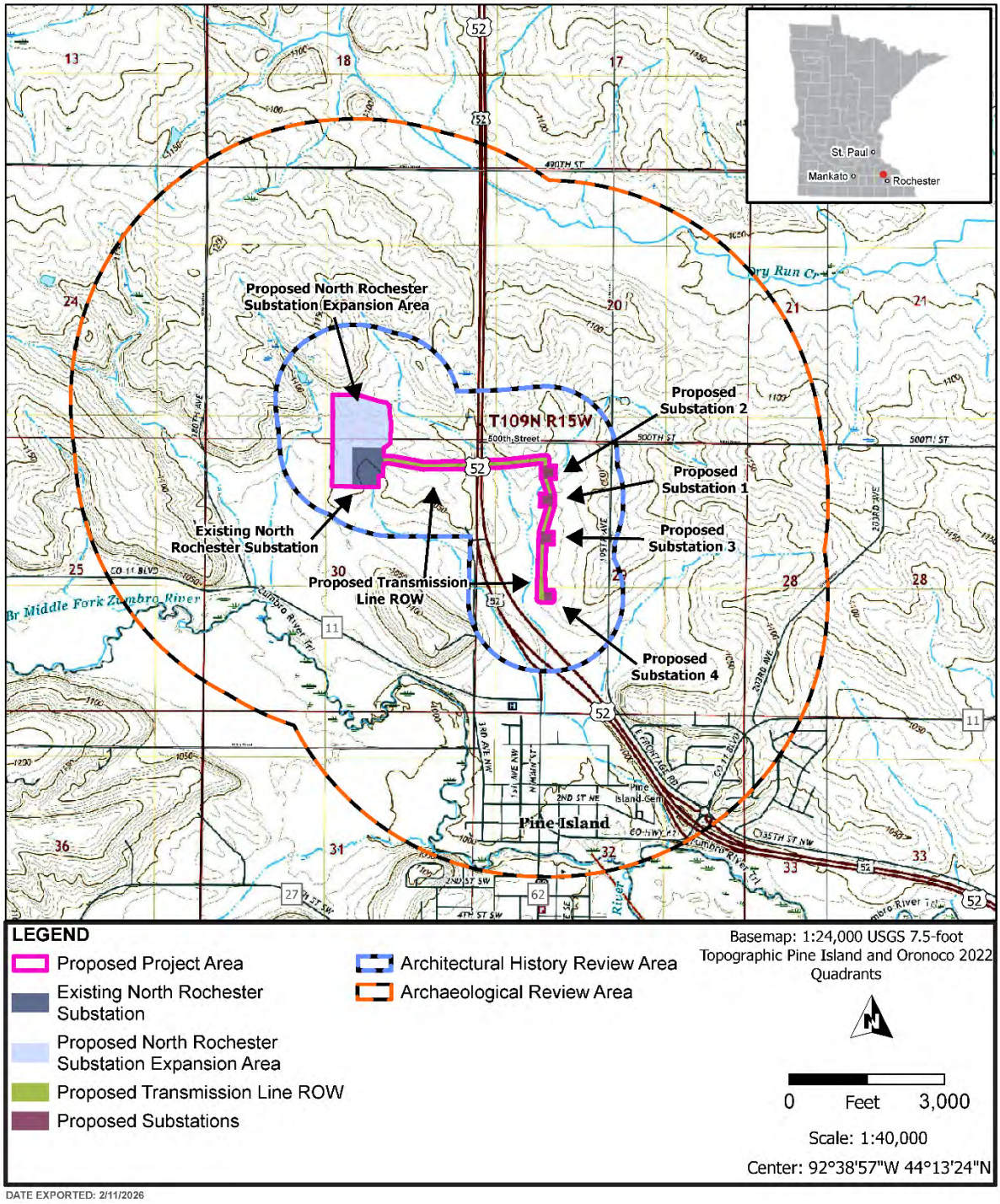
The Project is not anticipated to be deemed a federal undertaking because it does not require a federal permit, license, or approval; is not located on federally owned or managed land; and is not receiving federal financial assistance. If the Project is determined to be a federal undertaking, the lead federal agency will determine if compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, is needed. Considering the Project will be applying for approval of a Route Permit from the PUC, compliance with state cultural resources laws is required. The cultural resources documentation was prepared to meet state cultural resources regulations, including the Minnesota Field Archaeology Act (MS 138.31-.42), Minnesota Private Cemeteries Act (MS 307.08, subd 9-10), and Minnesota Historic Sites Act (MS 138.661-138.669).

In October 2025, prior to field survey, HDR reviewed records maintained by the Minnesota Office of the State Archaeologist (OSA) available via the online portal and Minnesota State Historic Preservation Office (SHPO) in Minnesota's Statewide Historic Inventory Portal (MnSHIP) to identify previously reported archaeological sites within 1 mile of the Project area (Archaeological Review Area) and previously inventoried architectural history properties within 0.25 mile of the Project area (Architectural History Review Area). The Phase I Archaeological Survey was completed October 29, 2025. HDR staff member John Seidl acted as Principal Investigator for the Phase I field survey with Laura Koski acting as Field Supervisor. The proposed 150-foot-wide transmission line ROW, North Rochester Substation expansion, and Skyway substations 1-4 would be constructed primarily on land currently being farmed for corn and soybeans. The portion of the field survey within the North Rochester Substation expansion area was pedestrian-surveyed on a 10-meter interval due to the low to moderate visibility. Pedestrian survey within the proposed transmission line ROW was completed

[1] The Skyway Project is being proposed by Ryan Companies US, Inc. An Alternative Urban Areawide Review (AUAR) has been completed for the development site project and the City of Pine Island is currently reviewing that project for applicable permits and approvals.

at a 15-meter interval due to the high ground surface visibility. No cultural materials were identified. HDR recommends the Project, as proposed, does not require any further cultural resources work.

Figure 1. Project Location



2 RESEARCH DESIGN

All work was conducted in accordance with the Minnesota SHPO Manual for Archaeological Projects in Minnesota (SHPO 2005), the State Archaeologist's Manual for Archaeological Projects in Minnesota (OSA 2011), the Minnesota SHPO's Historic and Architectural Survey Manual (SHPO 2017), and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation [48 Federal Register 44716-44740] (National Park Service [NPS] 1983).

2.1 Cultural Resources Literature Review

The primary objective of the cultural resource literature review was to identify whether there are known archaeological sites or known architectural properties within the Review Areas. The Review Areas encompassed the Project area (anticipated areas of potential construction disturbance, including the North Rochester Substation expansion area and a 150-foot-wide transmission line ROW connecting the North Rochester Substation and planned Skyway substations 1-4), as well as a 1-mile buffer for archaeological sites and surveys (Archaeological Review Area) and 0.25 mile for architectural properties (Architectural History Review Area) to provide a broader cultural context for the proposed Project area and identify resources that may be directly or indirectly affected by the Project. The 0.25-mile Architectural History Review Area reflects the potential distance the Project could incur indirect effects (visual, noise, vibration, etc.) on the characteristics that make architectural historic properties eligible for the National Register of Historic Places (NRHP).

In October 2025, prior to conducting the field survey, HDR staff conducted the cultural resources literature review using records maintained by the Minnesota OSA available via the online portal to identify previously reported archaeological sites overlapping the Archaeological Review Area, and records maintained by the Minnesota SHPO in MnSHIP to identify previously NRHP-listed, eligible, or inventoried properties within the Architectural History Review Area.

2.2 Phase I Archaeological Survey

2.2.1 Field Survey

The field survey utilized pedestrian methodology consisting of transects spaced between 10- to 15-meter intervals, dependent on ground surface visibility. If surface finds were identified, exploratory shovel testing would be conducted to determine the vertical and horizontal boundaries of the archaeological site.

2.2.2 Site Recording and Evaluation

HDR recorded field results with photography, notes on paper, and Field Maps (ESRI Suite). If sites were identified during survey, archaeological site forms would be prepared and reported to the Minnesota OSA. However, no sites were identified.

2.2.3 Artifact Curation

If artifacts were collected during the field survey, they would be returned to the landowner. If the landowner did not want them returned, artifacts would be curated at the Minnesota Historical Society under HDR's 2025 repository agreement number 1108. However, no artifacts were collected, and no curation was required.

3 CULTURAL RESOURCES LITERATURE REVIEW RESULTS

HDR completed a cultural resources literature review for the proposed Project in October 2025 prior to conducting the field survey. These results are summarized below.

3.1 Archaeological Resources

Archaeological site inventory data obtained from the Minnesota OSA identified three (3) previously recorded archaeological sites within the Archaeological Review Area (**Table 1** and **Figure 2**). One previously recorded verified site (21GD0248) and two previously recorded alpha sites (21GDs and 21GDt) are located within the Archaeological Review Area. Alpha sites are archaeological resources recorded via historical documentation or landowner report, but have not yet been field verified. None of these sites are located within the Project area.

Table 1. Previously Recorded Archaeological Resources within the Archaeological Review Area

Archaeological Site ID	Name	Site Type	Cultural Context	NRHP Eligibility	Distance from Project Area
21GDt	Howard Haggard Mill	Historical documentation	Early Settlement and Agricultural Development (1840-1870); Railroad and Agricultural Development (1870-1940)	Unevaluated	0.52 Mile
21GDs	Pine Island Mill	Historical documentation	Early Settlement and Agricultural Development (1840-1870); Railroad and Agricultural Development (1870-1940)	Unevaluated	0.77 Mile
21GD0248	Goodhue Good View	Lithic scatter	Archaic Tradition: Riverine; Pre-Contact Cultural Tradition: Archaic Tradition; Pre-Contact Cultural Tradition	Unevaluated	0.95 Mile

Figure 2. Literature Review Results **[PROTECTED DATA BEGINS**

Figure 2 of this report has been removed as confidential privileged information.

PROTECTED DATA ENDS]

HDR obtained data from the Minnesota OSA which identified two recorded cemeteries (MN Cemetery ID 20715 and 20716) within the Archaeological Review Area (**Table 2** and **Figure 2**). The mapped boundary of one historical cemetery, 'Catholic Cemetery' (MN Cemetery ID 20716), encompasses a large area at the township level and was originally recorded through archival research (Pope and Fee 1998).

A review of historical plat and topographic maps of Goodhue County were unable to identify any Catholic cemeteries within the vicinity of this shape file area. A recent literature review of this cemetery site concluded it was related to one of two known Catholic cemeteries located south of the City of Pine Island in Olmsted County; St. Michael's Cemetery (MN Cemetery ID 22691) or the Early Catholic Cemetery (MN Cemetery ID 22735) (Stantec, Inc. [Stantec] 2025:11) (Figure 2). While St. Michael's Catholic Church is in the City of Pine Island, Minnesota, the associated cemetery for this church has been located further south, outside the Archaeological Review Area, since 1878 (Find-a-Grave 2025). No other historical document or account notes any other Catholic cemeteries within the Archaeological Review Area (Stantec 2025:10-11). The second historical cemetery within the Archaeological Review Area is the Village/Pine Island Cemetery (MN Cemetery ID 20715), located in the City of Pine Island, on the west side of Highway 52, north of Center Drive (Figure 2).

Table 2. Previously Recorded Historical Cemetery Locations

MN Cemetery ID	Name	Cultural Context	NRHP Eligibility	Distance from Project Area
20716	Catholic Cemetery	Early Settlement and Agricultural Development (1840-1870)	Unevaluated	Formally Mapped Boundary Overlaps Project Area*
20715	Village/Pine Island Cemetery	Early Settlement and Agricultural Development (1840-1870)	Unevaluated	0.89 Mile

*This cemetery was mapped overlapping the Project area. Further review by this body of work and Stantec (2025) concludes the actual location as being outside the Project area.

3.1.1 Previous Archaeological Surveys

A previous Phase I Archaeological Survey for the Project was conducted between April 28-30 and June 9, 2025 (Stantec 2025;**Figure 3**). The previous survey included a portion of the Project area overlapping the transmission line section east of Highway 52. This overlapping portion was pedestrian surveyed by Stantec at 15-meter intervals through agricultural fields with high ground surface visibility between 50-90 percent. No cultural resources were identified within the Project area by this survey (Stantec 2025:13).

3.2 Architectural History Properties

Seven previously inventoried architectural history properties were identified in the MnSHIP data within the Architectural History Review Area. Three of these properties are located within the Project area. Inventoried architectural history properties are listed below in Table 3 and the three linear

properties intersecting the Project are discussed in greater detail below in Section 3.2.1. These properties have been determined by the Minnesota SHPO to be Not Eligible for listing in the NRHP and none are included in the State Register of Historic Places or the Historic Sites Network.

Figure 3. Historical Cemetery Locations in Relation to Project Area

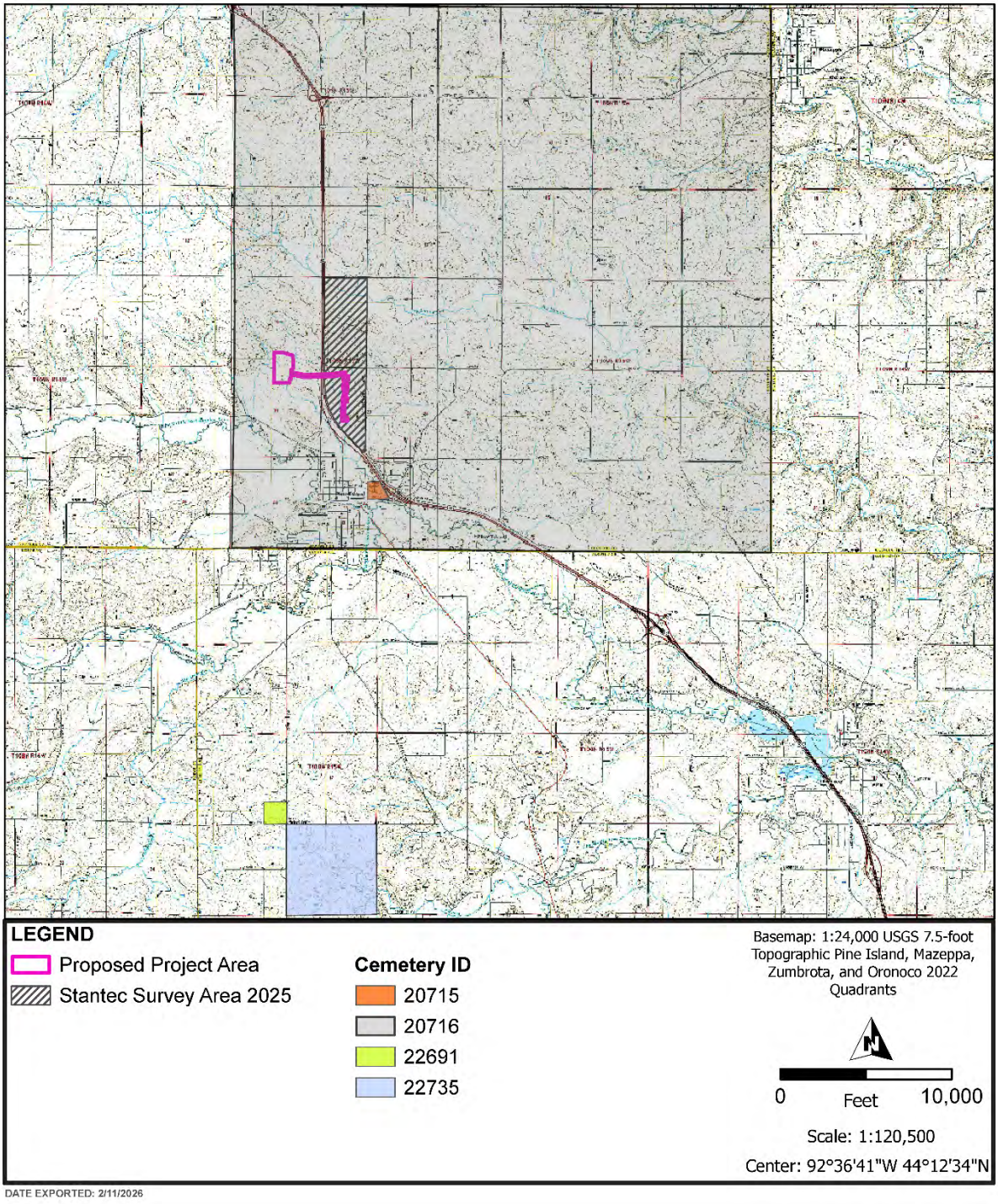


Table 3. Previously Inventoried Architectural History Properties

Inventory No.	Historic Name	Address	Historic Use	NRHP Status	Distance from Project Area
XX-ROD-00185	US Trunk Highway 52	n/a	Roadway	Minnesota SHPO Determined Not Eligible	Intersects the Project Area
XX-RRD-CGW006	Chicago Great Western Railway Company, Rochester to Zumbrota	n/a	Railroad	Minnesota SHPO Determined Not Eligible	Intersects the Project Area
XX-RRD-CNW045	Chicago and North Western Railway Company	n/a	Railroad	Minnesota SHPO Determined Not Eligible	Intersects the Project Area
GD-PIT-00031	Dickinson Farmstead	4997 Hwy 52	Farmstead (Non-extant)	Recommended Not Eligible	0.07 Mile
GD-PIT-00030	Farmstead	19131 500th Street	Farmstead	Recommended Not Eligible	0.15 Mile
GD-PIT-00029	Manthei Farmstead	East side of 195th Ave, between 500th St & Oak Ln	Farmstead	Recommended Potentially Eligible	0.15 Mile
GD-PIT-00028	Edison Barn	East side of 195th Ave, between 500th St & Oak Ln	Barn (Non-extant)	Recommended Not Eligible	0.16 Mile

3.2.1 Previously Inventoried Architectural Properties Intersecting the Project Area

US Trunk Highway 52, XX-ROD-00185

The linear roadway corridor of Highway 52 extends through multiple counties from the Minnesota-Iowa state line south of Prosper to the Minnesota-North Dakota state line at Moorhead and crosses the Project area centrally from north to south (**Figure 2**). The roadway was previously surveyed in 2022 and was determined by the Minnesota SHPO to be Not Eligible for listing in the NRHP.

Chicago Great Western Railway Company, Rochester to Zumbrota, XX-RRD-CGW006

This railroad corridor was built in 1902 and travels from Rochester to Zumbrota, Minnesota. The railroad was abandoned between 1965 and 1972. The property intersects the easternmost end of the Project area (**Figure 2**). The railroad was previously surveyed in 2024 and was determined by the Minnesota SHPO to be Not Eligible for listing in the NRHP.

Chicago and North Western Railway Company, XX-RRD-CNW045

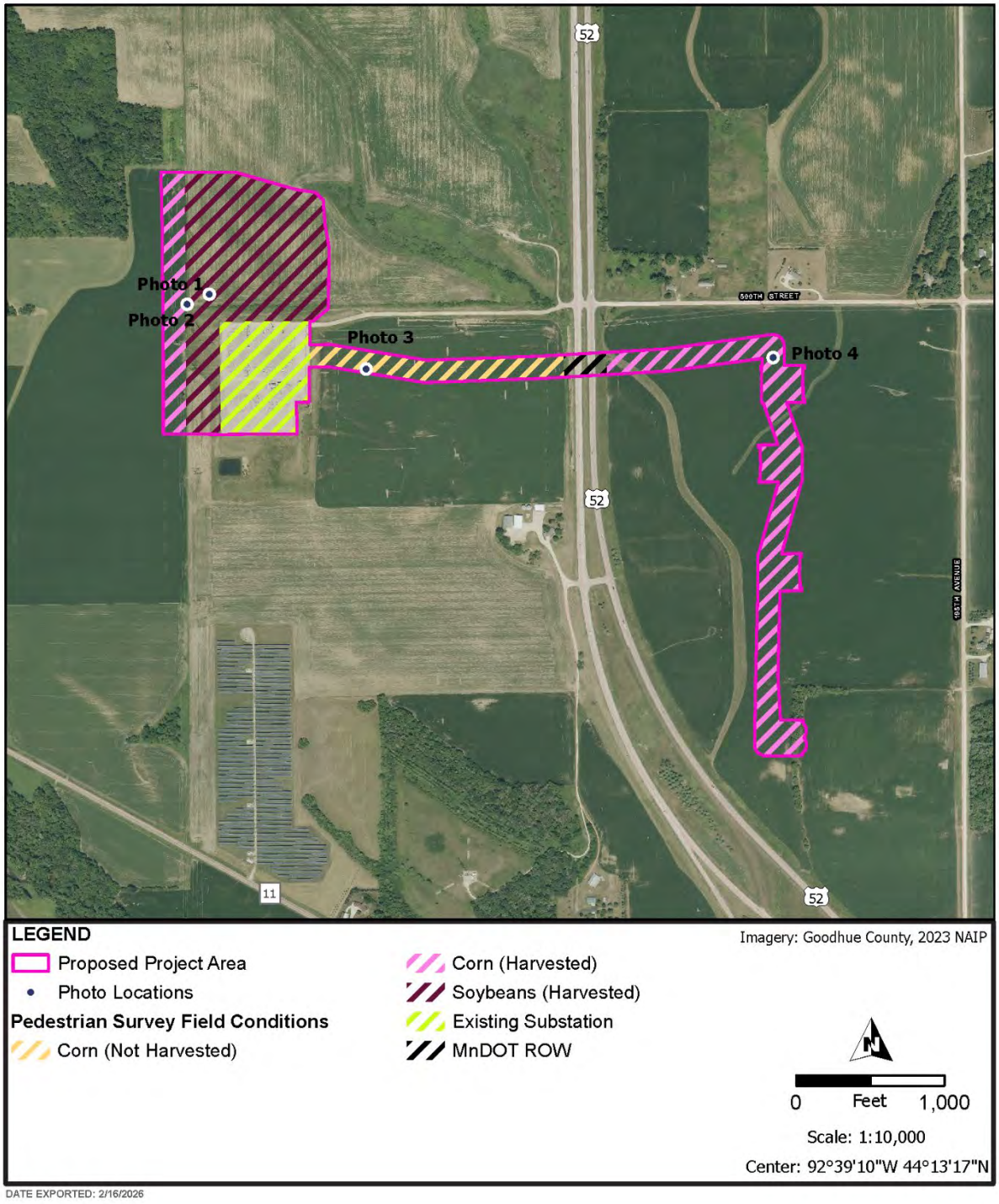
This abandoned railroad corridor historically paralleled the Chicago Great Western Railway Company, Rochester to Zumbrota (XX-RRD-CGW006) corridor. The property intersects the Project area at the easternmost point (**Figure 2**). This railroad was previously surveyed in 2024 and was determined by the Minnesota SHPO to be Not Eligible for listing in the NRHP.

4 PHASE I ARCHAEOLOGICAL SURVEY RESULTS

HDR completed the Phase I Archaeological Survey on October 29, 2025, covering 39.47 acres. The existing North Rochester Substation was not included in the survey. Ground surface visibility within the North Rochester Substation expansion survey area ranged between 30 percent and 50 percent and varied between 30 percent and 90 percent within the proposed 150-foot-wide transmission line ROW (**Appendix A**). Pedestrian survey within the North Rochester Substation expansion area and transmission line ROW west of Highway 52 was completed on a 10-meter interval due to the low to moderate visibility. Pedestrian survey within the transmission line ROW to the east of Highway 52 intended to connect to the planned Skyway substations 1-4 locations was completed on a 15-meter interval due to the high ground surface visibility.

The North Rochester Substation survey area had been growing soybeans which were harvested by the time of the survey while the transmission line ROW west of Highway 52 contained not yet harvested corn, however, visibility between rows was moderately high averaging 50 percent. The transmission line ROW section east of Highway 52 had been fully harvested by the time of the survey, providing between 70 percent and 95 percent surface visibility. No cultural materials or archaeological sites were identified within the Project area.

Figure 4. Phase I Archaeological Survey Results



5 CONCLUSIONS AND RECOMMENDATIONS

The Literature Review determined there are no previously recorded archaeological sites and two known cemeteries within the Archaeological Review Area. Neither of the previously recorded cemeteries are located within the Project area. There are seven previously inventoried architectural history properties within the Architectural History Review Area and three of these intersect the Project area. These three architectural history properties intersecting the Project area have been determined by the Minnesota SHPO to be Not Eligible for listing in the NRHP and are not included in the State Register of Historic Places or the State Historic Sites Network.

HDR completed a Phase I Archaeological Survey within the Project area on October 29, 2025. The proposed 150-foot-wide transmission line ROW, North Rochester Substation expansion, and Skyway substations 1-4 would be constructed primarily on land currently being farmed for corn and soybeans. The portion of the field survey within the North Rochester Substation expansion area and the transmission line ROW west of Highway 52 was pedestrian-surveyed on a 10-meter interval due to the low to moderate visibility. Pedestrian survey within the proposed transmission line ROW west of Highway 52 was completed on a 15-meter interval due to the high ground surface visibility. No cultural materials were identified.

The seven previously inventoried architectural/history properties within a 0.25-mile buffer of the Project area are determined by the Minnesota SHPO to be Not Eligible for Listing in the NRHP, State Register of Historic Places, or the Historic Sites Network. Therefore, regarding both archaeological and architectural resources, pursuant to the Minnesota Historic Sites Act (MS 138.611-138.669), HDR recommends a finding of No Historic Properties and no further cultural resources work for the Project as currently proposed.

5.1 Inadvertent Discoveries

Although the possibility of encountering cultural resources within the Project area is low, HDR recommends that prior to construction activities, construction personnel be briefed on procedures to follow in the event buried human remains or unanticipated cultural resources are encountered. The briefing shall include an overview of historical resources and potential cultural resources that could be encountered during ground-disturbing activities to facilitate worker recognition and resource avoidance. If any such discovery is made or if the Project area is expanded in any way, OSA personnel should be contacted for further instruction. In the event of a discovery, work will cease within 50 feet of the find until a qualified archaeologist can determine the nature of the resources discovered. In addition to the stipulations above, if human skeletal remains or burial goods associated with an unmarked human burial are discovered, the discovery shall be reported to law enforcement. Human burial sites on both private and public lands in Minnesota are protected under the Private Cemeteries Act (Ch. 307 Minnesota Statutes), and preferably an Unanticipated Discoveries Plan would be implemented prior to ground-disturbing activities to ensure compliance with this Act if human remains were to be uncovered during the Project.

6 REFERENCES

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Appendix A: Field Photography

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Photo 1. Overview of the North Rochester Substation expansion area from southwestern corner of expansion area facing north.

Photo 2. Ground surface visibility of harvested field in the North Rochester Substation expansion area.

Photo 3. Overview of standing corn in transmission line ROW corridor east of North Rochester Substation facing east on the west side of Highway 52.

Photo 4. Overview of harvested field in the transmission line ROW corridor on east side of Highway 52 from southern end of ROW facing north.