

ATTACHMENT N

INDR SHPO Review and Sign Off Letter

To: Allie Loschen
Nexamp

From: William Pridden
Chicago

Project/File: 193807004

Date: July 7, 2024

Reference: Dundee Solar Project, Kane County, Illinois.

On behalf of Dundee Renewables, LLC (the client), Stantec Consulting Services Inc. (Stantec) conducted cultural resources reviews of the proposed Dundee Solar Project (Project) near the Village of West Dundee, Kane County, Illinois to ascertain requirements for consideration of cultural resources under state and federal laws. Section 707 of the Illinois State Agency Historic Resources Preservation Act (Public Act 86-707; 20 ILCS 3420) would apply to the Project because it would require a state level permit. Based on the information provided by the client, Section 106 of the National Historic Preservation Act (Public Act 54 U.S.C 306108) is not applicable to the Project as it does not utilize federally owned/managed lands or federal funding and would not require a federal permit or decision. The results of Stantec's review are provided below.

1 Illinois Section 707 Review

Stantec requested the Illinois State Historic Preservation Office (SHPO) conduct an initial project review of the proposed Project under Section 707 on May 6th, 2024. Stantec submitted the results of a desktop cultural review to SHPO for review and requested the SHPO to concur with our recommendation that the Project be allowed to proceed as planned based on the findings. SHPO responded to Stantec on June 10th, 2024, and declared the Project EXEMPT pursuant to Section of the Illinois State Agency Historic Resources Preservation Act.

2 Federal Section 106 Review

Based on the information available from the client, the Project currently has no federal undertaking required and Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) is not applicable to the Project. Should the need for Section 106 review arise in the future based upon the use of federal funding or the need for a federal permit or decision, it will be the responsibility of the lead federal agency to comply with the requirements of Section 106 at that time. The lead federal agency could choose to delegate aspects of their responsibility under Section 106 to the client.

3 Background Research

Stantec conducted a review of the Illinois Historic Resources Geographic Information System (HARGIS) and the Illinois Inventory of Archaeological Sites (IAS) to identify historic properties that are either listed in or eligible for listing in the National Register of Historic Places (NRHP) to support review of the Dundee Solar Project (the Project) under Section 707, and Section 106 if it would become necessary in the future. This review examined cultural resources recorded within the Project area and a 1-mile buffer surrounding

Reference: Dundee Solar Project, Kane County, Illinois.

the Project area. For the purposes of Section 106 review, Stantec assumes that the Project area would be considered the Area of Potential Effects (APE) for direct effects and the 1-mile buffer would encompass any APE for indirect effects established by the lead federal agency.

The review of HARGIS identified no historical structures recorded within the Project area, or within the 1-mile buffer. A site visit identified seven properties within the ¼-mile Area of Potential Effect (APE). The perimeter of the Project area contains natural vegetation which obscures most of the surrounding structures.

The IAS review found no archaeological sites within the Project area, and an additional 13 archaeological sites within the 1-mile buffer of the Project area. All 13 archaeological sites are documented as not eligible for inclusion within the National Register of Historic Places (NRHP). There are no cemeteries within the Project area, or within the 1-mile buffer. There have been two previous archaeological surveys conducted within the Project area (K9377 and K19100), and 18 previous surveys have been conducted within 1-mile of the Project area. K9377 was conducted in anticipation of a Department of Transportation project in 2011 by the Illinois State Archaeological Survey (ISAS). K19100 was conducted in anticipation of a bridge construction project in 1988 by the Illinois State Archaeological Survey. These surveys did not locate any archaeological sites within the Project area.

There are currently no NRHP-listed or -eligible historic properties recorded within the Project area. Therefore, Stantec recommends a finding of *No Historic Properties Affected* by the lead federal agency if Section 106 review is triggered by a future federal undertaking.

Best regards,

STANTEC CONSULTING SERVICES INC.



William Pridden M.A RPA
Archaeologist
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Attachment: SHPO Clearance



Illinois
Department of
**Natural
Resources**

JB Pritzker, Governor • Natalie Phelps Finnie, Director
One Natural Resources Way • Springfield, Illinois 62702-1271

www.dnr.illinois.gov

Kane County
West Dundee
W of Boyer Road, N of Huntley Rd.
Section:6-Township:42N-Range:8E
IEPA, Stantec-193807004
New Construction, Dundee Solar

PLEASE REFER TO: SHPO LOG #021051524

June 10, 2024

William Pridden
Stantec Consulting Services, Inc.
350 North Orleans Street, Suite 1301
Chicago, IL 60654-1983

The Illinois State Historic Preservation Office is required by the Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420, as amended, 17 IAC 4180) to review all state undertakings for their effect on cultural resources. Pursuant to this requirement, we have received information regarding the above referenced project for our comment.

According to the information provided there is no federal involvement in your project. Be aware the state law is less restrictive than the federal cultural resource laws concerning archaeology. If your project will use federal loans or grants, need federal agency permits, use federal property, or involve assistance from a federal agency, then your project must be reviewed under the National Historic Preservation Act of 1966, as amended. Please notify us immediately if such is the case.

Our files do not identify any known historic properties within this proposed project area, nor is it within the high probability area for archaeological resources as defined in the state Act. Accordingly, this project is **EXEMPT** pursuant to Section 6 of the Illinois State Agency Historic Resources Preservation Act. An archaeological survey for your above referenced project is not *required* under Illinois law as there is no public funding and it is not on public land. Please know, however, we are always receptive to reviewing the results of any due diligence survey coverages that may help prevent unanticipated discoveries during construction.

This does not pertain to any discovery during construction, nor is it a clearance for purposes of the Illinois Human Remains Protection Act (20 ILCS 3440).

If further assistance is needed please contact Jeff Kruchten, Principal Archaeologist, at 217/785-1279 or jeff.kruchten@illinois.gov.

Sincerely,

Carey L. Mayer, AIA
Deputy State Historic
Preservation Officer