

## APPENDIX S - CULTURAL RESOURCES

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

[www.dnr.illinois.gov](http://www.dnr.illinois.gov)

Livingston and Woodford Counties

Chenoa  
NW of Chenoa

Sections:1-6-Township:26N-Range:3E,  
Sections:2-6-Township:26N-Range:4E,  
Sections:1-36-Township:27N-Range:3E,  
Sections:1-35-Township:27N-Range:4E,  
Sections:1-5,8-13,16,17,20, 21,24-29,33-36-Township:28N-Range:3E,  
Sections:6,7,18,19,25-36-Township:28N-Range:4E,  
Sections:20-29,32-36-Township:29N-Range:3E,  
Sections:19,20,29-31-Township:29N-Range:4E

IEPA, USFWS

New construction, Panther Grove 2 Wind Energy Project

PLEASE REFER TO:

SHPO LOG #013010824

### **SURVEY REQUEST**

August 21, 2024

Abigail Heller-Leib

Burns & McDonnell

200 W. Adams St., Suite 2700

Chicago, IL 60606

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: Protection of Historic Properties.

The project area may contain significant archaeological resources. Accordingly, a Phase I archaeological **survey** to locate, identify, and record all archaeological resources within the project area will be **required**. The area(s) that need(s) to be surveyed include(s) all area(s) that will be developed as a result of the issuance of the federal agency permit or the granting of the federal grants, funds, or loan guarantees that have prompted this review. We approve of the proposed archaeological survey methodology submitted on July 19, 2024. If you have questions, please contact Jeff Kruchten, Principal Archaeologist, at 217/785-1279 or [jeff.kruchten@illinois.gov](mailto:jeff.kruchten@illinois.gov).

In addition to the archaeological survey, we also require addresses and current color photographs of all structures in or adjacent to the project area. We approve of the proposed two (2)-mile visual APE and proposed windshield survey methodology. The proposed batched resources summary memos are acceptable. If you have additional questions, please contact Rita Baker, Cultural Resources Manager, at 217/785-4998 or [rita.e.baker@illinois.gov](mailto:rita.e.baker@illinois.gov).

Sincerely,

Carey L. Mayer, AIA

Deputy State Historic Preservation Officer



July 19, 2024

Jeff Kruchten  
Principal Archaeologist  
Illinois State Historic Preservation Office  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, Illinois 62701

Re: Regulatory Update and Survey Plan for the Proposed Panther Grove 2 Wind Energy Project, Livingston and Woodford Counties, Illinois (SHPO Log #013010824)

Dear Jeff Kruchten:

This letter is regarding the proposed Panther Grove 2 Wind Energy Project (Project), which is being developed by Panther Grove 2, LLC (Panther Grove 2), a subsidiary of Copenhagen Infrastructure Partners. The Project is located in Livingston and Woodford Counties, Illinois (Attachment 1, Figure 1).

On behalf of Panther Grove 2, Stantec Consulting Services previously completed a cultural resources literature review (Menz 2024, see Attachment 2) and coordinated with the Illinois State Historic Preservation Office (SHPO) under the Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420, as amended, 17 IAC 4180). In April 2024, your office concluded that in addition to a revisit and reevaluation of all known archaeological sites in the Project, a Phase I archaeological reconnaissance survey was required to locate, identify, and record all archaeological resources within those portions of the Project with a high probability of containing significant archaeological resources. The associated letter also requested documentation of historic-age architectural resources and coordination with your office regarding the area of potential visual effects (SHPO Log #013010824).

Since that time, the Project area and regulatory context for the Project have changed. Additionally, Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell) completed a supplementary background review for new Project areas not previously examined in the former cultural resources literature review. Changes in the Project area and regulatory context, along with additional background research and proposed survey methods, are presented below.

## **Project Area**

The original Project area identified in the cultural resources literature review (Attachment 2) measured approximately 80,484 acres in Livingston County and the very northern edge of McLean County in Illinois. The Project area has since been revised (Attachment 1, Figure 2) to a maximum of 71,893 acres. Much of the Project remains in Livingston County; however, 14,504 acres of the Project are now in Woodford County, west of the original Project area. A general area



Jeff Kruchten  
Illinois State Historic Preservation Office  
July 19, 2024  
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has been established for a proposed transmission line for the Project; however, the exact alignment has not been established at this time.

## Regulatory Context

Since the original submission to the Illinois SHPO, Panther Grove 2 has identified the need to obtain an Incidental Take Permit (ITP) from the U.S. Fish and Wildlife Service (USFWS). As the Project will be permitted by a federal agency, it is now subject to compliance with Section 106 of the National Historic Preservation Act (NHPA) in addition to the Illinois State Agency Historic Resources Preservation Act.

## Proposed Area of Potential Effects (APE) and Survey Methods

### *Proposed Physical APE*

The proposed Physical APE will comprise all areas within the Project area where ground disturbance is proposed. Design is ongoing, and a final Physical APE has not yet been established; however, it will include turbines, buildable areas, access roads, crane walks, collection lines, substation, operations and maintenance building location, the transmission line right-of-way, areas of proposed mechanical vegetation clearing (e.g., grubbing), and/or any other portion of the Project area that will be physically disturbed during Project implementation.

As the Project is now subject to Section 106 of the NHPA, a Phase I archaeological survey is proposed in all areas of planned ground disturbance. A pedestrian walkover at 5-meter intervals will be implemented in areas with sufficient ground surface visibility (i.e., at least 25 percent). All areas with less than 25 percent ground surface visibility will be shovel-tested at 15-meter intervals. Additionally, per Illinois SHPO guidelines, known sites within the Physical APE will be revisited and reevaluated based on any new data.

The original background study (Menz 2024; see Attachment 2) identified 30 known archaeological sites within the Project area. Subsequent revisions to the Project area now result in a total of 38 known archaeological sites within the Project area, four of which were not discussed in the original background study (Table 1). Any known sites in or adjacent to the Project's Physical APE will be revisited, evaluated, and/or reevaluated (Attachment 1, Figure 3). Additionally, the original background study identified 5 cemeteries recorded in the Illinois State Museum (ISM) database within the Project area; no additional ISM cemeteries are within the revised Project area.



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**Table 1. Additional Known Archaeological Sites in Revised Project Area**

Site Number	Description/Component	Evaluation
11WD406	Mid-nineteenth to mid-twentieth-century habitation	Not eligible
11WD430	Late nineteenth to mid-twentieth century habitation	Not eligible
11WD442	Unknown prehistoric isolate	Not eligible
11WD443	Late nineteenth to early twentieth-century habitation	Potentially eligible

### *Proposed Non-Physical APE*

The revised Project footprint and Physical APE also result in an alternate Non-Physical APE. Per Illinois SHPO guidelines, Burns & McDonnell proposes a Non-Physical APE of 2 miles from all turbines (Attachment 1, Figure 4). Though the exact alignment has not yet been established, the Non-Physical APE will also comprise 0.5 mile on either side of the transmission line right-of-way.

In addition to the Phase I archaeological survey, evaluations of historic-age (40 years of age and older) architectural resources within the Non-Physical APE will be conducted as per National Register of Historic Places (NRHP) criteria. Preliminary background research was previously completed for the original Project Area to identify historic resources recorded on the Historic and Architectural Resources Geographic Information System (HARGIS) (see Attachment 2); however, supplemental research will be completed prior to field surveys, and a historic context will be developed to evaluate resources identified in the Non-Physical APE.

Due to the scope and size of the proposed Project, Burns & McDonnell historians propose an alternate methodology for the presentation of survey results. In lieu of preparation of a single large-scale historic resources survey report, Burns & McDonnell proposes to submit the results of the field survey in installments of approximately 100 resources via a summary memorandum, resource photograph appendices, a resource inventory table with NRHP eligibility recommendations, and accompanying GIS figures. Additionally, Burns & McDonnell proposes to conduct windshield evaluations of communities intersecting the APE rather than individual resource documentation. The windshield survey effort will include photo documentation of representative area resources and evaluations for potential NRHP district eligibility.

### **Summary**

All proposed archaeological and historic resource investigations for the Project will be conducted to professional standards and guidelines as per the requirements of the Illinois State Agency Historic Resource Preservation Act and in accordance with the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation* (48 FR 44716-44742), the



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Secretary's *Standard for Identification* (48 FR 44720-44723), and the Illinois SHPO *Submitting a Project for Review* guidelines (2024).

With this submittal, we request your review of the above information and the attached figures and concurrence with the proposed Physical and Non-Physical APEs and survey methods. Feel free to call me at 708-574-9330 or contact me via email at [ahellerleib@burnsmcd.com](mailto:ahellerleib@burnsmcd.com) if you have questions or need any additional information.

Sincerely,

Burns & McDonnell Engineering Company, Inc.

A handwritten signature in black ink that reads "Abby Heller Leib".

Abby Heller Leib, RPA  
Archaeologist, Cultural Resources Project Manager

Attachments:

- Attachment 1 – Figures
- Attachment 2 – Original Desktop Cultural Resources Study (Merz 2024)

cc: Allison Chapin, Burns & McDonnell  
Carsten Oversen, CIP  
Mohamed Ahmed Elmak, CIP